INSPECTION REPORT: BULK ASBESTOS SURVEY
SAN YSIDRO BORDER CROSSING
BUILDING CA0588
720 E. SAN YSIDRO
SAN DIEGO, CA 92115

***Prepared For*:**

GENERAL SERVICES ADMINISTRATION, REGION 9
SAFETY AND ENVIRONMENTAL BRANCH
450 GOLDEN GATE AVENUE, 4TH FLOOR EAST
SAN FRANCISCO, CA 94102

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GSA Contract No.: GS-09P-07-NQ-M-0023

SCA Project No.: G-8452

JUNE 2007

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List of Common Acronyms and Abbreviations

AAA	= Assumed Asbestos-Containing Materials
ACM	= Asbestos-Containing Materials
AHERA	= Asbestos Hazard Emergency Response Act
CAC	= Certified Asbestos Consultant
Cal/OSHA	= the California Division of Industrial Safety and Health
Cal/EPA	= the California Environmental Protection Agency
CAULK	= window and door perimeter caulking
CCR	= California Code of Regulations
CERCLA	= Comprehensive Environmental Response, Compensation, and Liability Act
CFR	= Code of Federal Regulations
CHMM	= Certified Hazardous Materials Manager
CIH	= Certified Industrial Hygienist
CSST	= Certified Site Surveillance Technician
DOHS	= the California Department of Health Services
DS/PLM	= Polarized Light Microscopy with Dispersion Staining
EPA	= the U.S. Environmental Protection Agency
EXPJNT	= expansion joint
FLVCS	= linoleum flooring
FLVCT	= vinyl composite floor tiles
ft^2	= square feet
GROUT	= ceramic tile and concrete grouts
HA	= homogeneous areas
LF	= linear feet
NESHAP	= National Emission Standard for Hazardous Air Pollutants
OSHA	= the federal Occupational Safety and Health Administration
PCB	= Polychlorinated Biphenyl
PCM	= Phase Contrast Microscopy
PEL	= Permissible Exposure Level
Penta	= Pentachlorophenol
PISTM	= steam thermal system pipe insulation
ppm	= parts per million
PUTTY	= window pane puttyy
QA/QC	= Quality Assurance/Quality Control
RCRA	= Resource Conservation Recovery Act
RCW	= Regulated Controlled Waste
REA	= Registered Environmental Assessor
RFAG	= built-up tar and gravel roofing
RFPTCH	= roof patching compounds
RFROLL	= rolled roofing
RWQCB	= the Regional Water Quality Control Board
SDAPCD	= San Diego Air Pollution Control District
SF	= square feet
STUCCO	= stucco
TEM	= Transmission Electron Microscopy
TSI	= Thermal System Insulation
WLCER	= ceramic wall tiles
WLPL	= wall plaster

1.0 Introduction

SCA Environmental, Inc. (SCA) was retained by the General Services Agency (GSA), Region 9 under contract Number GS-09P-07-NQ-M-0023 to provide a survey for asbestos-containing materials (ACM) for the purpose of providing an inventory of ACM at the facility. This report summarizes the results of the survey conducted at the San Ysidro Border Crossing Building CA0588 in San Diego, CA, from June 25th, 2007 to June 29th, 2007.

Individuals involved in the project, and their technical certifications, included:

GSA	**Role**	**Certifications**
Deborah Bernsdorf	Contracting Officer	
SCA Staff	**Role**	**Certifications**
Chuck Siu, PE, CIH, CAC	Sr. Project Consultant	• Professional Engineer (PE #C59672) • Certified Industrial Hygienist (CIH #2697) • Certified Asbestos Consultant (CAC #98-0098)
Erica Parks, CSST	Jr. Industrial Hygienist	• Certified Site Surveillance Technician (CSST #05-3775)
Amy Burgin	Jr. Industrial Hygienist	• AHERA Building Inspector Course (M&C Certificate #21540 I)

Contract laboratories which provided analytical services for the project included the following:

Laboratory	**Analysis Type**	**Accreditation**
EMLab P&K San Bruno, CA	Bulk Asbestos Analysis by Polarized Light Microscopy (PLM)	• National Voluntary Laboratory Accreditation Program (NVLAP); • National Lead Laboratory Accreditation Program (NLLAP); • California Environmental Laboratory Accreditation Program (ELAP); and • American Industrial Hygiene Association (AIHA)
ALSF, San Francisco, CA	QAQC Bulk Asbestos Analysis by Polarized Light Microscopy (PLM)	• National Voluntary Laboratory Accreditation Program (NVLAP); • California Environmental Laboratory Accreditation Program (ELAP); and • American Industrial Hygiene Association (AIHA)

1.1 Building Description

The San Ysidro Border Crossing Main Building (referred to as "the facility") is located at 720 E. San Ysidro Blvd. in San Diego, Ca. The facility, constructed in 1972, contains approximately 186,432 gross square feet of space comprised of a main office building, outside custom inspection buildings (East and West Headhouses, East and West Secondary Inspection Buildings, East and West Mechanical Rooms, Control Booth, Exit Control Room, Permit Office, and Bird Quarantine), and vehicle transportation lanes.

The facility houses the administrative and enforcement staff and offices for tenant agencies such as the United States Customs, United States Immigration and Naturalization Service (INS), the United States Department of Agriculture (USDA), and the General Services Administration (GSA). Tenant agencies use the facility to conduct operations including screening, processing and detaining of personnel in violation of Federal Regulations, and customer service to persons traveling to and from the United States and Mexico.

The facility structure consists mainly of steel beams, corrugated metal and concrete decking. The building exterior is comprised of pre-fabricated corrugated concrete panels and a rolled roofing system. Interior building materials consist mainly of drywall, laid-in acoustical ceiling tiles, vinyl floor tiles and carpet.

The facility contains three hydraulic powered elevators each supplied by a hydraulic oil storage tank. The facility consists of two main mechanical areas located in the East and West Mechanical buildings. The Heating Hot Water system is insulated by non-suspect fiberglass insulation with aluminum and paper jackets.

The mechanical systems located in the buildings are shown in the table below:

Mechanical System Component	Drawing/Space ID	Location
6 Air handling units and 2 cooling towers	HA-FP-RO/ROOF	Roof of Main Building
2 Air handling units and 1 heating hot water pump	HA-FP-02A/MECH	Second floor of east mechanical room of Main Building
1 Air handling unit	HA-FP-M1/MECH	West headhouse mexxanine of Main Building
2 Air handling units	HA-FP-M1/MECH2	Mezzanine south of Main Building
2 Air handling units	HA-FP-M1/MECH	East mechanical mezzanine of Main Building
3 Boilers [1], 2 chillers and 1 exhaust fan	HA-FP-01A/EMECH	First floor southeast mechanical room of Main Building

1. Natural gas, Raypak, Inc., installed in 2002 replacing 2 older units.

2.0 Executive Summary

The purpose of this project was to conduct a survey for asbestos-containing materials (ACM), in order to provide an inventory of ACM in San Ysidro Border Crossing Building CA0588, located at 720 E. San Ysidro in San Diego, CA. This survey was not destructive in nature and was therefore not intended to identify 100% of the ACM in the building. GSA requires that a separate, comprehensive destructive asbestos sampling survey be performed prior to any renovation or demolition work.

2.1 Summary of Findings

A total of 230 bulk samples were collected from 61 distinct suspect ACM homogenous areas (HA). The following is a summary of the ACM, as identified:

Identified Asbestos-Containing Materials:

HA	Material Description
300	Residual un-abated ACM structural fireproofing (1987 bulk sample ID's 130079 - 130083)
315	12" x 12" Gray/green vinyl composite floor tile with lighter streaks and associated mastics
611	Smooth plaster finishing coat over rough, sandy plaster in “CORR 2” of East Head House

The following are suspect materials were NOT sampled due to the destructive nature of such sampling, or the likelihood that sampling would destroy the function of the material, or the inaccessible nature of the material; the are assumed asbestos containing until laboratory analysis proves otherwise:

HA	Material Description
AAA01	Assumed asbestos containing mastics under non-suspect gray, textured plastic wall panels
AAA02	9" x 9" Red brick pavers with associated gray grout and mortar
AAA03	Black vinyl composite sheeting with raised circular treads and associated mastics in elevators
AAA04	Black terrazzo with black and white specks
AAA05	Rolled gray gravel roofing and associated mastics on 720, including penthouses and parapets
AAA06	Tar and/or felt vapor barrier assembly
AAA07	Asbestos core fire-rated door
AAA08	Rough, blue and gray speckled terrazzo flooring in HOLD 3
AAA09	6" x 6" Red brick ceramic pavers with associated grout and mortar
AAA10	4' Off-white non-suspect plastic wallboard with associated assumed mastics in the West Headhouse
AAA11	4' White non-suspect plastic wallboard with associated assumed mastics
AAA12	10' White non-suspect plastic paneling with associated assumed mastics
AAA13	Blue terrazzo flooring in Secondary Inspection

1. AAA = Assumed asbestos-containing

3.0 Methodology

Asbestos sampling was performed in accordance with AHERA 3-5-7 guidelines as well as with GSA specifications and in a fashion designed to minimize exposure of the surveyor or building occupants to airborne asbestos fibers. No destructive sampling occurred.

Analysis of suspect materials was conducted using “stop at first positive” procedures. Under these procedures, the samples from each HA are analyzed sequentially. When a sample tests positive for asbestos (>1%), the analysis of the remaining samples in the given HA is suspended. If a sample tests only trace positive (between 0.1 to 1%), or negative, then the remaining samples are analyzed sequentially, in order to determine the possible presence of asbestos. If all samples taken from an HA test negative, the material is considered non-asbestos. If one or more samples from an HA test "trace" positive (<1%), the material is considered to be trace positive. If one or more samples from an HA are positive for asbestos, the material is considered asbestos containing.

All asbestos samples collected were submitted to a NVLAP accredited Laboratory for analysis by dispersion staining with polarized light microscopy (DS/PLM).

SCA's survey included a thorough inspection of each room in the building, including roofs and exteriors of building structures, for the presence, quantity and condition of suspect materials. The survey did not include buried utilities or pipe tunnels, and did not include any destructive sampling.

4.0 Applicable Standards

ACM is defined by EPA regulations as those substances containing greater than 1% asbestos (40 CFR Section 61, Subpart M). The SDAPCD and the Cal/EPA provide local enforcement of these regulations. According to regulation, friable ACM with greater than 1% asbestos must be disposed of as asbestos containing waste.

Federal Occupational Safety and Health Administrations (OSHA) regulations (29 CFR 1910 & 1926), locally enforced by CAL/OSHA (8 CCR, Article 4, Section 1529 & Article 110, Section 5208), defines ACM as substances that contain greater than 1% asbestos. Cal/OSHA also mandates special training, medical exams, personal protective equipment and record keeping for employees working with ACM.

The State of California also regulates" Trace" materials containing less than 1% asbestos but more than 0.1% asbestos. Trace materials may be disposed of as non-ACM[1], but Cal/OSHA requirements regarding workers' protection and Contractor licensing still apply:

- Removal using wet methods;
- Prohibition of removal using abrasive saws or methods which would aerosolize the material;
- Prompt clean-up of the impacted zone, using HEPA-filtered vacuums, as applicable;
- Employer registration by Cal/OSHA for removal quantities exceeding 100 sq. ft. per year;
- Cal/OSHA Carcinogen Registration by the Demolition or Abatement Contractor impacting such materials;
- Cal/OSHA Certified Site Surveillance Technician (CSST);
- Cal/OSHA Certified Asbestos Consultant (CAC); and
- CSLB licensed abatement contractor (CSLB).

[1] The material is subject to verification using the point count method prior to renovation, repair, or demolition work that involves this material.

5.0 Detailed Summary

5.1 Results

A total of 74 bulk samples were collected from 26 distinct suspect ACM homogenous areas (HA). Homogenous areas are suspect materials with uniform color and texture per the Federal EPA guidelines. The following is a summary of the ACM, as identified:

Identified Asbestos-Containing Materials:

HA	Material ID	Material Description
300	STSFP-300	Residual un-abated ACM structural fireproofing (1987 bulk sample ID's 130079 - 130083)
315	FLVCT-315	12" x 12" Gray/green vinyl composite floor tile with lighter streaks and associated mastics
611	WLPL-611	Smooth plaster finishing coat over rough, sandy plaster in Corr 2 of East Headhouse

The following suspect materials were NOT sampled due to the destructive nature of such sampling, or the likelihood that sampling would destroy the function of the material, or the inaccessible nature of the material; they are assumed asbestos containing until laboratory analysis proves otherwise:

HA	Material ID	Material Description
AAA01	PANEL-AAA1	Assumed mastics under non-suspect gray, textured plastic wall panels
AAA02	BRICK-AAA2	9" x 9" Red brick pavers with associated gray grout and mortar
AAA03	FLVCT-AAA3	Black vinyl composite sheeting with raised circular treads and associated mastics in elevators
AAA04	TERRAZZO-AAA4	Black terrazzo with black and white specks
AAA05	RFROLL-AAA5	Rolled gray gravel roofing and associated mastics on 720, including penthouses and parapets
AAA06	VAPOR-AAA6	Tar and/or felt vapor barrier assembly
AAA07	FIREDOORS-AAA7	Asbestos core fire-rated door
AAA08	TERRAZZO-AAA8	Rough, blue and gray speckled terrazzo flooring in HOLD 3
AAA09	BRICK-AAA9	6" x 6" Red brick ceramic pavers with associated grout and mortar
AAA10	PANEL-AAA10	4' Off-white non-suspect plastic wallboard with associated assumed mastics in the West Headhouse
AAA11	PANEL-AAA11	4' White non-suspect plastic wallboard with associated assumed mastics
AAA12	TERRAZZO-AAA12	10' White non-suspect plastic paneling with associated assumed
AAA13	PANEL-AAA13	Blue terrazzo flooring in Secondary Inspection

5.2 Non-Asbestos Materials (non-ACM)

Suspect materials that tested to be non-asbestos included the following:

HA	Material ID	Material Description
200	WLSH-200	Untextured drywall and tape partitions on East Mech First Floor
201	BBMAS-201	4" Light gray vinyl baseboard and associated mastics in East Mech
202	FILTER-202	Gray, cotton-like filter on First Floor of E. Mechanical wall vents
203	WLPL-203	Smooth, painted plaster on lath on E. Mechanical Second Floor walls
301	WLSH-301	Textured and painted drywall and tape throughout Main Bldg First Floor and some ceilings

HA	Material ID	Material Description
302	BBMAS-302	4" Light gray vinyl baseboard and associated mastics
303	FLVCT-303	12" x 12" Light gray vinyl composite floor tile with beige and gray streaks and associated mastics and leveling compounds
304	CLLI-304	2' x 4' Laid-in white ceiling tile with fissures and stipples
305	STSFP-305	Newer, gray structural fireproofing on beams and ducting throughout bldg
306	FLCER-306	2" x 2" Gray ceramic floor tile and associated grout and mortar
307	WLCER-307	4" x 4" Glazed, white and blue ceramic wall tile with associated grout and mortar
308	WLPL-308	Hard-top, textured ceiling plaster on lath in holding cells
309	BBMAS-309	4" Dark gray/green vinyl baseboard and associated mastic
310	FLVCT-310	12" x 12" Gray vinyl composite floor tile with beige and gray streaks and associated mastics
311	CLINS-311	Gray, felt insulation above aluminum ceiling slats (accessible only in an area with a broken slat)
312	WLPL-312	Textured wall plaster with skim coat and rough, sandy plaster layer on lath and concrete
313	FLVCT-313	12" x 12" Alternating light and dark gray/green vinyl composite floor tile and associated mastics
314	BBMAS-314	4" Red/brown vinyl baseboard and associated mastics
316	BBMAS-316	4" Black vinyl baseboard and associate mastic
317	WLSH-317	Painted and textured drywall with tape and mud throughout Second Floor, including walls and ceilings
318	CLPL-318	Rough textured, hard-top ceiling plaster on pedestrian canopy
319	WLCER-319	4" x 6" White, glazed ceramic wall tile with associated grout and mortar
320	BBMAS-320	4" Off-white vinyl baseboard and associated mastics
321	BBMAS-321	4" Tan vinyl baseboard patch and associated mastics
322	CLPL-322	Tan, rough textured, hard-top ceiling plaster over lath in holding cells on Second Floor
323	PENMAS-323	Gray/silver painted mastics at RFROLL-AAA5 sheet seams and penetrations
324	PARMAS-324	Gray/silver painted mastics at parapet walls
325	DHWMUD-325	Canvas wrapped mudded DHW joints/elbows in unabated Main Bldg canopy soffit with associated non-suspect fiberglass pipe lagging
400	FILTER-400	Tan and green exhaust air filters on Second Floor of West Mech
500	STSFP-500	Structural fireproofing on beams and decking throughout West Headhouse
501	BBMAS-501	4" Brown vinyl baseboard over 2" brown vinyl baseboard and associated mastics
502	WLSH-502	Untextured, painted drywall and tape on Mezzanine of West Headhouse
503	BBMAS-503	4" Dark brown vinyl baseboard and associated mastic
504	WLSH-504	Off-white, untextured drywall and tape throughout West Headhouse
505	CLLI-505	4' x 2' White, laid-in ceiling tile with stipples and fissures
506	WLCER-506	4" x 4" Off-white, glazed ceramic wall tile and associated grout and mortar in the West Headhouse
507	FLCER-507	1" x 1" Alternating light, medium, and dark brown ceramic floor tile and associated grout and mortar
508	BBMAS-508	4" Light gray vinyl baseboard and associated mastics in West Headhouse
509	FLVCT-509	12" x 12" Beige vinyl composite floor tile with tan and gray streaks with associated mastics and possible black vinyl layer underneath
510	CLPL-510	Hard-top ceiling plaster under roof canopy
600	WLSH-600	Drywall with tape on walls and some ceilings in East Headhouse
601	FLVCT-601	12" x 12" Light gray vinyl composite floor tile with beige streaks and associated mastics
602	BBMAS-602	4" Light gray vinyl baseboard and associated mastics in East Headhouse
603	BBMAS-603	4" Dark gray/green vinyl baseboard and associated mastics in East Headhouse
604	CLLI-604	4' x 2' Laid-in ceiling tile with stipples and fissures
605	STSFP-605	Gray structural fireproofing on beams and decking throughout East Headhouse
606	FLCER-606	2" x 2" Tan ceramic floor tile and associated grout and mortar

HA	Material ID	Material Description
607	WLCER-607	4" x 4" Off-white, glazed ceramic wall tile and associated grout and mortar in the East Headhouse
608	CLPL-608	Rough-textured, hard-top plaster on exterior portico and undersides
609	FLVCT-609	12" x 12" Beige vinyl composite floor tile with tan and gray specks and associated yellow and black mastics
610	BBMAS-610	4" Black vinyl baseboard with associated mastics
700	STUCCO-700	Exterior stucco on soffits
701	WLSH-701	White painted drywall with tape and mud
702	FLVCT-702	12" x 12" Blue vinyl composite floor tile with white and gray specks and associated mastics
703	BBMAS-703	4" Navy blue vinyl baseboard with associated mastics
704	CLLI-704	2' x 2' White, laid-in ceiling tile with fissures and stipples
800	STUCCO-800	Exterior stucco on Soffits
801	FLVCT-801	12" x 12" Light blue vinyl composite floor tile with white and gray specks and associated mastics
802	BBMAS-802	4" Dark gray/green vinyl baseboard and associated mastics in Permit Office
803	WLSH-803	Beige painted, untextured drywall with tape and mud in Permit Office
804	CLLI-804	4' x 2' Laid-in ceiling tile with stipples and fissures in Exit Control and Permit Office

5.3 Non-Suspect Materials

The following materials were visually inspected and determined to be non-suspect for asbestos content:

Material ID	Material Description
DUCT-NNN	Non-suspect fiberglass duct insulation
PI-NNN	Non-suspect fiberglass pipe insulation or un-insulated pipes

1. See the Materials Matrix Report in attachment 3 for detailed material locations

5.4 Discussion and Conclusions

This asbestos survey was non-destructive in nature and is not intended to identify 100% of asbestos in the building. Therefore, GSA requires a comprehensive asbestos sampling survey prior to renovation or demolition work.

All the asbestos materials are required to be abated prior to demolition or if impacted by proposed renovations. Currently, Cal/OSHA allows demolition of trace positive materials under non-containment conditions, as long as adequate dust control measures are used, and demolition personnel have received notification of the material's presence. Depending on results of air sampling during demolition, a low level of personal protection may also be required under the CAL/OSHA requirements.

Non-friable materials observed, such as roofing and vinyl flooring and mastics, can be disposed of as non-hazardous waste, at a significant cost savings over disposal as asbestos waste. Cal/EPA and USEPA allow disposal of non-friable materials as non-hazardous waste, assuming the materials are not made friable in the process of being abated. Some building owners choose to lower their liability by disposing of their non-friable ACM at a classified ACM landfill.

5.4.1 Homogenous Area 300 – Original ACM Structural Fireproofing

Homogenous Area 300 is comprised of un-abated original ACM structural fireproofing (1987 GSA c/o Design For Health, Inc. bulk sample ID's 130079 – 130083). Records indicate that the facility underwent extensive asbestos abatement activities in the late 1990's wherein structural fireproofing was abated from most areas with the exception of the main canopy underside of the second floor (see the attached 2002 Cal Inc. Environmental Audit Compliance Report, attachment 9, 1987 Industrial Health Inc. Facility Asbestos Action Plan).

Records indicate that HA 300 was not abated from the main canopy (2002 Cal Inc. Environmental Audit Compliance Report, Attachment 9, 1987 Industrial Health Inc. FAAP). This area was instead enclosed in a rigid barrier of lath and stucco with access hatches for maintenance personnel. SCA visually inspected this area with the assistance of maintenance personnel and a scissor lift. Upon entering the main canopy soffit, SCA noted the presence of ACM structural fireproofing debris settled throughout the space. While SCA was equipped with proper respiratory protection and training, maintenance personnel were unequipped and untrained; as a result SCA was forced to vacate the area after only a brief visual inspection. No additional samples were collected from this inspection area. Photographs of this space are included in Attachment 5.

In addition, SCA conducted confirmatory sampling of accessible structural fireproofing throughout the interior of the facility; all laboratory results were non-detect for asbestos. However, residual ACM fireproofing should be anticipated in inaccessible spaces such as between steel beams and decking, between beams and columns, between structural members and the concrete building envelope, between corrugated steel and concrete decking components, elevator shafts, etc.

6.0 Bulk Sample Summary

The following table is a summary of bulk sample results:

HA	Sample ID	Material Description	Result
200	WLSH-200-1	Untextured drywall and tape partitions on East Mech First Floor	ND
	WLSH-200-2		ND
	WLSH-200-3		ND
201	BBMAS-201-1	4" Light gray vinyl baseboard and associated mastics in East Mech	ND
	BBMAS-201-2		ND
202	FILTER-202-1	Gray, cotton-like filter on First Floor of E. Mechanical wall vents	ND
	FILTER-202-2		ND
	FILTER-202-3		ND
	FILTER-202-4		ND
203	WLPL-203-1	Smooth, painted plaster on lath on E. Mechanical Second Floor walls	ND
	WLPL-203-2		ND
	WLPL-203-3		ND
300	**STSFP-300-130079**	**Residual un-abated ACM structural fireproofing (1987 bulk sample IDs 130079 – 130083)**	**CH 10-20%**
	STSFP-300-130080		**CH 10-20%**
	STSFP-300-130081		**CH 10-20%**
	STSFP-300-130082		**CH 10-20%**
	STSFP-300-130083		**CH 10-20%**
301	WLSH-301-1	Textured and painted drywall and tape throughout Main Bldg First Floor and some ceilings	ND
	WLSH-301-2		ND
	WLSH-301-3		ND
	WLSH-301-4		ND
	WLSH-301-5		ND
	WLSH-301-6		ND
	WLSH-301-7		ND
302	BBMAS-302-1	4" Light gray vinyl baseboard and associated mastics	ND
	BBMAS-302-2		ND
	BBMAS-302-3		ND
303	FLVCT-303-1	12" x 12" Light gray vinyl composite floor tile with beige and gray streaks and associated mastics and leveling compounds	ND
	FLVCT-303-2		ND
	FLVCT-303-3		ND
	FLVCT-303-4		ND
	FLVCT-303-5		ND
	FLVCT-303-6		ND
304	CLLI-304-1	2' x 4' Laid-in white ceiling tile with fissures and stipples	ND
	CLLI-304-2		ND
	CLLI-304-3		ND
305	STSFP-305-1	Newer, gray structural fireproofing on beams and ducting throughout bldg	ND
	STSFP-305-2		ND
	STSFP-305-3		ND
	STSFP-305-4		ND
	STSFP-305-5		ND
	STSFP-305-6		ND
	STSFP-305-7		ND
	STSFP-305-8		ND
	STSFP-305-9		ND

HA	Sample ID	Material Description	Result
	STSFP-305-10		ND
	STSFP-305-11		ND
	STSFP-305-12		ND
	STSFP-305-13		ND
	STSFP-305-14		ND
	STSFP-305-15		ND
	STSFP-305-16		ND
	STSFP-305-17		ND
	STSFP-305-18		ND
	STSFP-305-19		ND
306	FLCER-306-1	2" x 2" Gray ceramic floor tile and associated grout and mortar	ND
	FLCER-306-2		ND
	FLCER-306-3		ND
307	WLCER-307-1	4" x 4" Glazed, white and blue ceramic wall tile with associated grout and mortar	ND
	WLCER-307-2		ND
	WLCER-307-3		ND
308	WLPL-308-1	Hard-top, textured ceiling plaster on lath in holding cells	ND
	WLPL-308-2		ND
	WLPL-308-3		ND
	WLPL-308-4		ND
309	BBMAS-309-1	4" Dark gray/green vinyl baseboard and associated mastic	ND
	BBMAS-309-2		ND
310	FLVCT-310-1	12" x 12" Gray vinyl composite floor tile with beige and gray streaks and associated mastics	ND
311	CLINS-311-1	Gray, felt insulation above aluminum ceiling slats (accessible only in an area with a broken slat)	ND
312	WLPL-312-1	Textured wall plaster with skim coat and rough, sandy plaster layer on lath and concrete	ND
	WLPL-312-2		ND
	WLPL-312-3		ND
	WLPL-312-4		ND
	WLPL-312-5		ND
	WLPL-312-6		ND
	WLPL-312-7		ND
313	FLVCT-313-1	12" x 12" Alternating light and dark gray/green vinyl composite floor tile and associated mastics	ND
	FLVCT-313-2		ND
	FLVCT-313-3		ND
314	BBMAS-314-1	4" Red/brown vinyl baseboard and associated mastics	ND
315	**FLVCT-315-1**	**12" x 12" Gray/green vinyl composite floor tile with lighter streaks and associated mastics**	**CH 2%**
	FLVCT-315-2		NA
	FLVCT-315-3		NA
316	BBMAS-316-1	4" Black vinyl baseboard and associate mastic	ND
	BBMAS-316-2		ND
	BBMAS-316-3		ND
317	WLSH-317-1	Painted and textured drywall with tape and mud throughout Second Floor, including walls and ceilings	ND
	WLSH-317-2		ND
	WLSH-317-3		ND
	WLSH-317-4		ND
	WLSH-317-5		ND

HA	Sample ID	Material Description	Result
	WLSH-317-6		ND
	WLSH-317-7		ND
	WLSH-317-8		ND
	WLSH-317-9		ND
318	CLPL-318-1	Rough textured, hard-top ceiling plaster on pedestrian canopy; the top side of this material is considered contaminated by debris from HA 300.	ND
	CLPL-318-2		ND
	CLPL-318-3		ND
	CLPL-318-4		ND
	CLPL-318-5		ND
	CLPL-318-6		ND
	CLPL-318-7		ND
	CLPL-318-8		ND
	CLPL-318-9		ND
319	WLCER-319-1	4" x 6" White, glazed ceramic wall tile with associated grout and mortar	ND
	WLCER-319-2		ND
	WLCER-319-3		ND
320	BBMAS-320-1	4" Off-white vinyl baseboard and associated mastics	ND
	BBMAS-320-2		ND
	BBMAS-320-3		ND
321	BBMAS-321-1	4" Tan vinyl baseboard patch and associated mastics	ND
322	CLPL-322-1	Tan, rough textured, hard-top ceiling plaster over lath in holding cells on Second Floor	ND
	CLPL-322-2		ND
	CLPL-322-3		ND
323	PENMAS-323-1	Gray/silver painted mastics at assumed asbestos rolled roofing (RFROLL-AAA5) seams and penetrations	ND
	PENMAS-323-2		ND
	PENMAS-323-3		ND
	PENMAS-323-4		ND
	PENMAS-323-5		ND
	PENMAS-323-6		ND
324	PARMAS-324-1	Gray/silver painted mastics at parapet walls	ND
	PARMAS-324-2		ND
	PARMAS-324-3		ND
	PARMAS-324-4		ND
	PARMAS-324-5		ND
	PARMAS-324-6		ND
325	DHWMUD-325-1	Canvas wrapped mudded DHW joints/elbows in unabated Main Bldg canopy soffit with associated non-suspect fiberglass pipe lagging	ND
400	FILTER-400-1	Tan and green exhaust air filters on Second Floor of West Mech	ND
	FILTER-400-2		ND
	FILTER-400-3		ND
500	STSFP-500-1	Structural fireproofing on beams and decking throughout West Headhouse	ND
	STSFP-500-2		ND
	STSFP-500-3		ND
	STSFP-500-4		ND
	STSFP-500-5		ND
501	BBMAS-501-1	4" Brown vinyl baseboard over 2" brown vinyl baseboard and associated mastics	ND
	BBMAS-501-2		ND
	BBMAS-501-3		ND
502	WLSH-502-1	Untextured, painted drywall and tape on Mezzanine of West	ND

HA	Sample ID	Material Description	Result
	WLSH-502-2	Headhouse	ND
	WLSH-502-3		ND
503	BBMAS-503-1	4" Dark brown vinyl baseboard and associated mastic	ND
	BBMAS-503-2		ND
	BBMAS-503-3		ND
504	WLSH-504-1	Off-white, untextured drywall and tape throughout West Headhouse	ND
	WLSH-504-2		ND
	WLSH-504-3		ND
505	CLLI-505-1	4' x 2' White, laid-in ceiling tile with stipples and fissures	ND
	CLLI-505-2		ND
	CLLI-505-3		ND
506	WLCER-506-1	4" x 4" Off-white, glazed ceramic wall tile and associated grout and mortar in the West Headhouse	ND
	WLCER-506-2		ND
	WLCER-506-3		ND
507	FLCER-507-1	1" x 1" Alternating light, medium, and dark brown ceramic floor tile and associated grout and mortar	ND
	FLCER-507-2		ND
	FLCER-507-3		ND
508	BBMAS-508-1	4" Light gray vinyl baseboard and associated mastics in West Headhouse	ND
	BBMAS-508-2		ND
	BBMAS-508-3		ND
509	FLVCT-509-1	12" x 12" Beige vinyl composite floor tile with tan and gray streaks with associated mastics and possible black vinyl layer underneath	ND
	FLVCT-509-2		ND
	FLVCT-509-3		ND
510	CLPL-510-1	Hard-top ceiling plaster under roof canopy	ND
	CLPL-510-2		ND
	CLPL-510-3		ND
600	WLSH-600-1	Drywall with tape on walls and some ceilings in East Headhouse	ND
	WLSH-600-2		ND
	WLSH-600-3		ND
601	FLVCT-601-1	12" x 12" Light gray vinyl composite floor tile with beige streaks and associated mastics	ND
	FLVCT-601-2		ND
	FLVCT-601-3		ND
602	BBMAS-602-1	4" Light gray vinyl baseboard and associated mastics in East Headhouse	ND
	BBMAS-602-2		ND
	BBMAS-602-3		ND
603	BBMAS-603-1	4" Dark gray/green vinyl baseboard and associated mastics in East Headhouse	ND
	BBMAS-603-2		ND
	BBMAS-603-3		ND
604	CLLI-604-1	4' x 2' Laid-in ceiling tile with stipples and fissures	ND
	CLLI-604-2		ND
	CLLI-604-3		ND
605	STSFP-605-1	Gray structural fireproofing on beams and decking throughout East Headhouse	ND
	STSFP-605-2		ND
	STSFP-605-3		ND
	STSFP-605-4		ND
	STSFP-605-5		ND
	STSFP-605-6		ND
	STSFP-605-7		ND
606	FLCER-606-1	2" x 2" Tan ceramic floor tile and associated grout and mortar	ND
	FLCER-606-2		ND

HA	Sample ID	Material Description	Result
	FLCER-606-3		ND
607	WLCER-607-1	4" x 4" Off-white, glazed ceramic wall tile and associated grout and mortar in the East Headhouse	ND
	WLCER-607-2		ND
	WLCER-607-3		ND
608	CLPL-608-1	Rough-textured, hard-top plaster on exterior portico and undersides	ND
	CLPL-608-2		ND
	CLPL-608-3		ND
609	FLVCT-609-1	12" x 12" Beige vinyl composite floor tile with tan and gray specks and associated yellow and black mastics	ND
	FLVCT-609-2		ND
	FLVCT-609-3		ND
610	BBMAS-610-1	4" Black vinyl baseboard with associated mastics	ND
	BBMAS-610-2		ND
	BBMAS-610-3		ND
611	**WLPL-611-1**	**Smooth plaster finishing coat over rough, sandy plaster in Corr 2 of East Headhouse**	**CH 2%**
	WLPL-611-2		**CH 1-3%**
	WLPL-611-3		ND
700	STUCCO-700-1	Exterior stucco on soffits	ND
	STUCCO-700-2		ND
	STUCCO-700-3		ND
701	WLSH-701-1	White painted drywall with tape and mud	ND
	WLSH-701-2		ND
	WLSH-701-3		ND
702	FLVCT-702-1	12" x 12" Blue vinyl composite floor tile with white and gray specks and associated mastics	ND
	FLVCT-702-2		ND
	FLVCT-702-3		ND
703	BBMAS-703-1	4" Navy blue vinyl baseboard with associated mastics	ND
	BBMAS-703-2		ND
	BBMAS-703-3		ND
704	CLLI-704-1	2' x 2' White, laid-in ceiling tile with fissures and stipples	ND
	CLLI-704-2		ND
	CLLI-704-3		ND
800	STUCCO-800-1	Exterior stucco on Soffits	ND
	STUCCO-800-2		ND
	STUCCO-800-3		ND
801	FLVCT-801-1	12" x 12" Light blue vinyl composite floor tile with white and gray specks and associated mastics	ND
	FLVCT-801-2		ND
	FLVCT-801-3		ND
802	BBMAS-802-1	4" Dark gray/green vinyl baseboard and associated mastics in Permit Office	ND
	BBMAS-802-2		ND
	BBMAS-802-3		ND
803	WLSH-803-1	Beige painted, untextured drywall with tape and mud in Permit Office	ND
	WLSH-803-2		ND
	WLSH-803-3		ND
804	CLLI-804-1	4' x 2' Laid-in ceiling tile with stipples and fissures in Exit Control and Permit Office	ND
	CLLI-804-2		ND
	CLLI-804-3		ND

6.1 QA/QC Discussion

All samples were initially submitted to EMLab P&K in San Bruno, CA for PLM analysis. Additionally, SCA randomly selected and forwarded approximately 16% of the samples for QA/QC reanalysis by ALSF in San Francisco, CA. QA/QC results were consistent with original laboratory analysis results with the exception of 1 discrepancy. Where analyses differ, SCA requested final QA/QC reanalysis. The most conservative results are utilized for the purposes of this survey report and the resulting Facility Asbestos Action Plan.

The following table summarizes the QA/QC results for both building CA0581 and CA0588 surveyed in June 2006 under GSA contract GS-09P-07-NQ-M-0023:

Building	No. Samples to EMLabs	No. Samples to QA/QC labs	No. of discrepancies	Notes
CA0581	77	12 (16%)	1 (.08%)	EMLabs reported PUTTY-101 samples 1 thru 6 as ND; QA/QC labs reported 3 out of 6 PUTTY-101 samples as positive. [1]
CA0588	230	26 (11%)	1 (.04%)	EMLabs reported WLPL-611 as positive; QA/QC analysis reported WLPL-611 as ND.[2]
Totals	**307**	**38 (12%)**	**2 (.005%)**	

1. QA/QC analysis of PUTTY-101 appears to demonstrate a systematic problem in the analysis of putties by EMLabs. SCA has shared these results and observations with EMLabs to facilitate their in-house QA/QC and improvement procedures.
2. Analytical discrepancies with respect to WLPL-611 were determined to be a result of the pulverization and reduction of sample material such that when the sample was analyzed by the QA/QC laboratory, the amount of material present was insufficient and/or diluted.

7.0 Summary of Homogenous Areas

The following table is a summary of asbestos, trace and assumed asbestos homogenous areas (HA) identified by SCA. Quantities are listed as a total for each HA. For more detailed locations and quantities, refer to the Materials Matrix Report (MMR) in attachment 3.

Identified Asbestos-Containing Materials:

HA	Material ID	Material Description	Qty	Units
300	STSFP-300	Un-abated ACM structural fireproofing (1987 bulk sample ID's 130079 - 130083) in the main canopy soffit	32000	SF
315	FLVCT-315	12" x 12" Gray/green vinyl composite floor tile with lighter streaks and associated mastics	564	SF
611	WLPL-611	Smooth plaster finishing coat over rough, sandy plaster in Corr 2 of East Headhouse	1680	SF

The following suspect materials were NOT sampled due to the destructive nature of such sampling, or the likelihood that sampling would destroy the function of the material, or the inaccessible nature of the material; they are assumed asbestos containing until laboratory analysis proves otherwise:

HA	Material ID	Material Description	Qty	Units
AAA01	PANEL-AAA1	Assumed mastics under non-suspect gray, textured plastic wall panels	1520	SF
AAA02	BRICK-AAA2	9" x 9" Red brick pavers with associated gray grout and mortar	9208	SF
AAA03	FLVCT-AAA3	Black vinyl composite sheeting with raised circular treads and associated mastics in elevators	80	SF
AAA04	TERRAZZO-AAA4	Black terrazzo with black and white specks	3260	SF
AAA05	RFROLL-AAA5	Rolled gray gravel roofing and associated mastics on 720, including penthouses and parapets	71600	SF
AAA06	VAPOR-AAA	Tar and/or felt vapor barrier assembly	9217	SF
AAA07	FIREDOORS-AAA	Asbestos core fire-rated door	129	Each
AAA08	TERRAZZO-AAA8	Rough, blue and gray speckled terrazzo flooring in HOLD 3	2980	SF
AAA09	BRICK-AAA9	6" x 6" Red brick ceramic pavers with associated grout and mortar	2426	SF
AAA10	PANEL-AAA10	4' Off-white non-suspect plastic wallboard with associated assumed mastics	320	SF
AAA11	PANEL-AAA11	4' White non-suspect plastic wallboard with associated assumed mastics	360	SF
AAA12	PANEL-AAA12	10' White non-suspect plastic paneling with associated assumed mastics	1550	SF
AAA13	TERRAZZO-AAA13	Blue terrazzo flooring in Secondary Inspection East & West	1086	SF

8.0 Summary of Damaged ACM & Recommended Response / Cost

SCA encountered damaged ACM in the following locations:

Functional Space	Material Description	Qty	Recommended Response	Cost
EXTERIOR				
CANOPIES	Residual un-abated ACM structural fireproofing (1987 bulk sample ID's 130079 - 130083)	32000	Label canopy soffit access hatches with asbestos warning labels; Ensure that ONLY trained personnel with proper respiratory protection are allowed access to the space.	$5,000

9.0 Summary Listing of Identified ACM & Abatement Cost

This following table lists all ACM, Trace (<1%) asbestos, and assumed ACM identified in each inspection area of the building, and includes the preliminary abatement cost estimate for each HA in each functional space. Costs include a 25% mark-up for estimated costs as results of security and access restrictions unique to the San Ysidro Border Crossing.

Functional space designations are spatially contiguous inspection areas grouped by visual similarity and function. The following functional spaces are used in place of room designations and can be cross-referenced with the Materials Matrix Report found in Attachment 3, as well as cross-referenced graphically in the sample location drawings found in Attachment 4

Functional Space	Material Description	Qty	Cost + 25%
MAIN OFFICE BUILDING - FIRST FLOOR			
BREAK	Asbestos core fire-rated door	1 Each	$125
CORR 1	Asbestos core fire-rated door	9 Each	$1,125
CORR 2	Asbestos core fire-rated door	12 Each	$15,000
CUST	9" x 9" Red brick pavers with associated gray grout and mortar	60 SF	$375
ELEC 1	NA	NA	
ELEC 2	NA	NA	
HOLD 1	Tar and/or felt vapor barrier assembly	1200 SF	$30,000
	Rough, blue and gray speckled terrazzo flooring	1200 SF	$30,000
HOLD 2	Tar and/or felt vapor barrier assembly	300 SF	$7,500
	Rough, blue and gray speckled terrazzo flooring	300 SF	$7,500
HOLD 3	Tar and/or felt vapor barrier assembly	1080 SF	$27,000
	Rough, blue and gray speckled terrazzo flooring	1080 SF	$27,000
HOLD4	Tar and/or felt vapor barrier assembly	400 SF	$10,000
	Rough, blue and gray speckled terrazzo flooring	400 SF	$10,000
LOCKER 1	NA	NA	
LOCKER 2~	NA	NA	
OFFICE 2	NA	NA	
OFFICE 3	NA	NA	
OFFICE 4	Asbestos core fire-rated door	1 Each	$125
OFFICE 5	NA	NA	
OFFICE 6	NA	NA	
OFFICE 7	NA	NA	
OFFICE 8	NA	NA	
OFFICE 9	NA	NA	
OFFICE 10~	NA	NA	
PEDESTRN	9" x 9" Red brick pavers with associated gray grout and mortar	9100 SF	$56,875
	Asbestos core fire-rated door	11 Each	$13,750
RECEPT	Asbestos core fire-rated door	1 Each	$125
STOR	NA	NA	
TELE 1	NA	NA	
TLT 1	Tar and/or felt vapor barrier assembly	72 SF	$1,800
TLT 3	Tar and/or felt vapor barrier assembly	48 SF	$1,200
VEST 1	Asbestos core fire-rated door	1 Each	$125

Functional Space	Material Description	Qty	Cost + 25%
VEST 2	Asbestos core fire-rated door	2 Each	$250
WOMEN / MEN 1	Tar and/or felt vapor barrier assembly	720 SF	$18,000
WOMEN / MEN 2	Tar and/or felt vapor barrier assembly	460 SF	$11,500
MAIN OFFICE BUILDING - MEZZANINE			
ATTIC	NA	NA	
CORR	12" x 12" Gray/green vinyl composite floor tile with lighter streaks and associated mastics	180 SF	$1,125
ELEC	NA	NA	
MECH	NA	NA	
TELE	12" x 12" Gray/green vinyl composite floor tile with lighter streaks and associated mastics	384 SF	$2,400
MAIN OFFICE BUILDING - SECOND FLOOR			
BREAK 1	NA	NA	
BREAK 2	NA	NA	
COMPUTER	Asbestos core fire-rated door	1 Each	$125
CORR	Assumed asbestos mastics under non-suspect textured gray/off-white plastic wall panels	1200 SF	
	Asbestos core fire-rated door	75 Each	$9,375
CUST 1	NA	NA	
CUST 2	NA	NA	
CUST 3	NA	NA	
HOLDING	Tar and/or felt vapor barrier assembly	900 SF	$22,500
LOCKERS 1	NA	NA	
LOCKERS 2	NA	NA	
LOCKERS 3	NA	NA	
LOCKERS 4	NA	NA	
OFFICE 1	NA	NA	
OFFICE 2	NA	NA	
OFFICE 3~	NA	NA	
OFFICE 4	NA	NA	
OFFICE 5	NA	NA	
OFFICE 6	NA	NA	
OFFICE 7	NA	NA	
OFFICE 8	NA	NA	
OFFICE 9	NA	NA	
OFFICE 10	NA	NA	
OFFICE 11	NA	NA	
OFFICE 12	NA	NA	
RECEPTION	Assumed asbestos mastics under non-suspect textured gray/off-white plastic wall panels	320 SF	$2,000
TELE	NA	NA	
TOILET	9" x 9" Red brick pavers with associated gray grout and mortar	48 SF	$300
	Tar and/or felt vapor barrier assembly	70 SF	$1,750
WOMEN/ MEN 1	Black terrazzo with black and white specks	600 SF	$15,000
WOMEN/ MEN 2	Black terrazzo with black and white specks	600 SF	$15,000
	Tar and/or felt vapor barrier assembly	500 SF	$12,500
WOMEN/ MEN 3	Black terrazzo with black and white specks	600 SF	$15,000
	Tar and/or felt vapor barrier assembly	700 SF	$17,500

Functional Space	Material Description	Qty	Cost + 25%
WOMEN/ MEN 4	Black terrazzo with black and white specks	600 SF	$15,000
	Tar and/or felt vapor barrier assembly	440 SF	$11,000
MAIN OFFICE BUILDING - ALL FLOORS			
NE STAIR	NA	NA	
NW STAIR	NA	NA	
ELEV 1	Black vinyl composite sheeting with raised circular treads and associated mastics in elevators	40 SF	$250
ELEV 2	Black vinyl composite sheeting with raised circular treads and associated mastics in elevators	40 SF	$250
EAST HEADHOUSE			
COMPTR	NA	NA	
CORR	Asbestos core fire-rated door	15 Each	$1,875
CORR 2	Smooth plaster finishing coat over rough, sandy plaster in Corr 2 of East Headhouse	1680 SF	$31,500
	Black terrazzo with black and white specks	300 SF	$7,500
ELEC	NA	NA	
HOLD 1	Black terrazzo with black and white specks	350 SF	$8,750
HOLD 2	Black terrazzo with black and white specks	210 SF	$5,250
LAB	NA	NA	
MECH*	NA	NA	
MEN/ WOMEN	Tar and/or felt vapor barrier assembly	480 SF	$12,000
OFFICE 1	NA	NA	
OFFICE 2	NA	NA	
OFFICE 3	NA	NA	
WAITING	NA	NA	
RECEPT	NA	NA	
BREAK	4' White non-suspect plastic wallboard with associated assumed mastics	360 SF	$2,250
TELE 1*	NA	NA	
TELE 2*	NA	NA	
TOILET	Tar and/or felt vapor barrier assembly	105 SF	$2,625
STAIR	NA	NA	
WEST HEADHOUSE			
BREAK	4' Off-white non-suspect plastic wallboard with associated assumed mastics	80 SF	$500
COMPTR	NA	NA	
CORR	6" x 6" Red brick ceramic pavers with associated grout and mortar	600 SF	$3,750
	4' Off-white non-suspect plastic wallboard with associated assumed mastics	240 SF	$1,500
CUST	6" x 6" Red brick ceramic pavers with associated grout and mortar	36 SF	$225
HOLD	Tar and/or felt vapor barrier assembly	270 SF	$6,750
	6" x 6" Red brick ceramic pavers with associated grout and mortar	1350 SF	$8,438
MEN/ WOMEN	Tar and/or felt vapor barrier assembly	300 SF	$7,500
OFFICE 1	6" x 6" Red brick ceramic pavers with associated grout and mortar	240 SF	$1,500
OFFICE 2	6" x 6" Red brick ceramic pavers with associated grout and mortar	1200 SF	$7,500

Functional Space	Material Description	Qty	Cost + 25%
OFFICE 3	NA	NA	
OFFICE 4	6" x 6" Red brick ceramic pavers with associated grout and mortar	80 SF	$500
RECEPT	NA	NA	
MECH 2	NA	NA	
VAULT*	NA	NA	
MEZZ (MECH)	NA	NA	
STAIR	NA	NA	
SECONDARY INSPECTION EAST			
OFFICE	10' White non-suspect plastic paneling with associated assumed mastics	900 SF	$5,625
TOILET 1	Tar and/or felt vapor barrier assembly	56 SF	$1,400
TOILET 2	Tar and/or felt vapor barrier assembly	36 SF	$900
	Blue terrazzo flooring in Secondary Inspection East & West	36 SF	$900
SECONDARY INSPECTION WEST			
HOLD	Blue terrazzo flooring in Secondary Inspection East & West	200 SF	$5,000
TOILET	10' White non-suspect plastic paneling with associated assumed mastics	250 SF	$1,563
	Blue terrazzo flooring in Secondary Inspection East & West	25 SF	$625
OFFICE	10' White non-suspect plastic paneling with associated assumed mastics	400 SF	$2,500
	Blue terrazzo flooring in Secondary Inspection East & West	375 SF	$9,375
EAST MECHANICAL			
FIRST FLOOR	NA	NA	
MEZZ	NA	NA	
STAIR	NA	NA	
WEST MECHANICAL			
FIRST FLOOR	NA	NA	
MEZZ	NA	NA	
SECOND FLOOR	NA	NA	
STAIR	NA	NA	
CONTROL BOOTH			
BOOTH	NA	NA	
EXIT CONTROL			
BOOTH	NA	NA	
PERMIT OFFICE			
OFFICE	NA	NA	
TOILET	Blue terrazzo flooring in Secondary Inspection East & West	270 SF	$6,750
TELE	NA	NA	
BIRD QUARANTINE			
STORAGE	Blue terrazzo flooring in Secondary Inspection East & West	180 SF	
EXTERIOR			
EXTERIOR	NA	NA	
PEDESTRIAN	NA	NA	
CANOPIES	Residual un-abated ACM structural fireproofing (1987 bulk sample ID's 130079 - 130083)	32000	$1,200,000
ROOFS	Rolled gray gravel roofing and associated mastics on all roofs	71600	$1,790,000

1. Functional Space Locations correspond to Functional Space boundaries shown in the attached Material Location drawings.

10.0 Preliminary Cost Estimate

Preliminary cost estimates for the abatement of asbestos-containing, Trace asbestos-containing, and assumed asbestos-containing materials include a 25% mark-up for estimated costs as a result of security and access restrictions unique to the San Ysidro Border Crossing. Costs are tabulated as follows, with details shown in the Abatement Cost Estimate in attachment 3:

Identified Asbestos-Containing Materials:

HA	Material ID	Material Description	Qty	Units	$/Unit	Subtotal
300	STSFP-300	Residual un-abated ACM structural fireproofing (1987 bulk sample ID's 130079 - 130083)	32000	SF	$30	$960,000
315	FLVCT-315	12" x 12" Gray/green vinyl composite floor tile with lighter streaks and associated mastics	564	SF	$5	$2,820
611	WLPL-611	Smooth plaster finishing coat over rough, sandy plaster in Corr 2 of East Headhouse	1680	SF	$15	$25,200

Identified materials not sampled, but assumed to contain asbestos:

HA	Material ID	Material Description	Qty	Units	$/Unit	Subtotal
AAA01	PANEL-AAA1	Assumed asbestos mastics under non-suspect textured gray/off-white plastic wall panels	1520	SF	$5	$7,600
AAA02	BRICK-AAA2	9" x 9" Red brick pavers with associated gray grout and mortar	9208	SF	$55	$506,440
AAA03	FLVCT-AAA3	Black vinyl composite sheeting with raised circular treads and associated mastics in elevators	80	SF	$5	$400
AAA04	TERRAZZO-AAA4	Black terrazzo with black and white specks	3260	SF	$20	$65,200
AAA05	RFROLL-AAA5	Rolled gray gravel roofing and associated mastics on all roofs	716000	SF	$20	$1,432,000
AAA06	VAPOR-AAA6	Tar and/or felt vapor barrier assembly	9217	SF	$20	$184,340
AAA07	FIREDOORS-AAA7	Asbestos core fire-rated door	129	Each	$100	$12,900
AAA08	TERRAZZO-AAA8	Rough, blue and gray speckled terrazzo flooring	2980	SF	$20	$59,600
AAA09	BRICK-AAA9	6" x 6" Red brick ceramic pavers with associated grout and mortar	2426	SF	$5	$12,130
AAA10	PANEL-AAA10	4' Off-white non-suspect plastic wallboard with associated assumed mastics	320	SF	$5	$1,600
AAA11	PANEL-AAA11	4' White non-suspect plastic wallboard with associated assumed mastics	360	SF	$5	$1,800
AAA12	TERRAZZO-AAA12	10' White non-suspect plastic paneling with associated assumed mastics	1550	SF	$5	$7,750
AAA13	PANEL-AAA13	Blue terrazzo flooring in Secondary Inspection East & West	1086	SF	$20	$21,720

Preliminary Cost Estimate Summary:

SUMMARY	**Subtotal**	**% OF TOTAL**
ASBESTOS CONTAINING MATERIALS	$988,020	30%
ASSUMED ASBESTOS CONTAINING MATERIALS	$2,313,480	70%
TOTAL ABATEMENT COST ESTIMATE	**$3,301,500**	

Note that materials assumed to be asbestos containing (AAA) might be determined to be negative following additional bulk sampling, and account for approximately 70% of the abatement cost estimate.

11.0 Limitations and Exclusions

SCA warrants that this survey was performed using due care and state of the art techniques. Beyond this, SCA does not warrant or guarantee the survey. This survey was not destructive in nature and was not designed to identify 100% of the ACM in the building. Therefore, GSA requires that a separate, comprehensive destructive asbestos sampling survey prior to any renovation or demolition work, which should include sampling of any assumed and suspect materials identified by SCA but not sampled in this survey.

This document is not a stand-alone document; SCA recommends abatement of materials under the oversight and design of an AHERA-accredited Project Designer and Certified Asbestos Consultant. Although due care is exercised in the course of the survey, concealed materials may be found in the course of abatement or demolition activities.

Attachment 1

Laboratory Results

EMLab P&K
1150 Bayhill Drive, Suite 100, San Bruno, CA 94066
(650) 829-5800 Fax (650) 829-5852 www.emlab.com

Client: SCA Environmental, Inc.
C/O: Ms. Erica Parks
Re: B8452; 720 and 801 E. San Ysidro GSA

Date of Sampling: 06-26-2007
Date of Receipt: 06-28-2007 and 07-28-2007
Date of Report: 07-02-2007

ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Total Samples Submitted:	62
Total Samples Analysed:	62
Total Samples with Composite Asbestos Value > 1%:	0

Location: WLSH-200-1 Lab ID-Version‡: 1340694-1

Sample Layers	Asbestos Content
Paint	ND
White Drywall	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	10% Glass Fibers
Sample Composite Homogeneity:	Good

Location: WLSH-200-2 Lab ID-Version‡: 1340693-1

Sample Layers	Asbestos Content
White Drywall	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	10% Glass Fibers
Sample Composite Homogeneity:	Good

Location: WLSH-200-3 Lab ID-Version‡: 1340692-1

Sample Layers	Asbestos Content
Paint	ND
Off-White Skim Coat	ND
White Drywall	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	10% Glass Fibers
Sample Composite Homogeneity:	Good

Location: BBMAS-201-1 Lab ID-Version‡: 1340691-1

Sample Layers	Asbestos Content
Gray Baseboard	ND
Tan Baseboard Adhesive	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

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Client: SCA Environmental, Inc.
C/O: Ms. Erica Parks
Re: B8452; 720 and 801 E. San Ysidro GSA

Date of Sampling: 06-26-2007
Date of Receipt: 06-28-2007 and 07-28-2007
Date of Report: 07-02-2007

ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: BBMAS-201-2 Lab ID-Version‡: 1340690-1

Sample Layers	Asbestos Content
Gray Baseboard	ND
Tan Baseboard Adhesive	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: FILTER-202-1 Lab ID-Version‡: 1340688-1

Sample Layers	Asbestos Content
Gray Fibrous Material	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	99% Synthetic Fibers
Sample Composite Homogeneity:	Good

Location: FILTER-202-2 Lab ID-Version‡: 1340687-1

Sample Layers	Asbestos Content
Gray Fibrous Material	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	99% Synthetic Fibers
Sample Composite Homogeneity:	Good

Location: FILTER-202-3 Lab ID-Version‡: 1340686-1

Sample Layers	Asbestos Content
Blue Fibrous Material	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	85% Cellulose 10% Synthetic Fibers
Sample Composite Homogeneity:	Good

Location: FILTER-202-4 Lab ID-Version‡: 1340685-1

Sample Layers	Asbestos Content
Blue Fibrous Material	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	85% Cellulose 10% Synthetic Fibers
Sample Composite Homogeneity:	Good

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ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: WLPL-203-1 Lab ID-Version‡: 1340684-1

Sample Layers	Asbestos Content
Paint	ND
Beige Plaster	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: WLPL-203-2 Lab ID-Version‡: 1340683-1

Sample Layers	Asbestos Content
Paint	ND
Beige Plaster	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: WLSH-301-1 Lab ID-Version‡: 1340682-1

Sample Layers	Asbestos Content
Off-White Skim Coat	ND
White Drywall	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	10% Glass Fibers
Sample Composite Homogeneity:	Good

Location: WLSH-301-2 Lab ID-Version‡: 1340681-1

Sample Layers	Asbestos Content
Off-White Skim Coat	ND
White Drywall	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	10% Glass Fibers
Sample Composite Homogeneity:	Good

Location: WLSH-301-3 Lab ID-Version‡: 1340680-1

Sample Layers	Asbestos Content
Off-White Skim Coat	ND
White Drywall	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	10% Glass Fibers
Sample Composite Homogeneity:	Good

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ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: WLSH-301-4 Lab ID-Version‡: 1340679-1

Sample Layers	Asbestos Content
Paint	ND
Off-White Skim Coat	ND
White Drywall	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	10% Glass Fibers
Sample Composite Homogeneity:	Good

Location: WLSH-301-5 Lab ID-Version‡: 1340678-1

Sample Layers	Asbestos Content
Paint	ND
Off-White Skim Coat	ND
White Drywall	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	10% Glass Fibers
Sample Composite Homogeneity:	Good

Location: WLSH-301-6 Lab ID-Version‡: 1340677-1

Sample Layers	Asbestos Content
Off-White Skim Coat	ND
White Drywall	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	10% Glass Fibers
Sample Composite Homogeneity:	Good

Location: WLSH-301-7 Lab ID-Version‡: 1340676-1

Sample Layers	Asbestos Content
Off-White Skim Coat	ND
White Drywall	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	10% Glass Fibers
Sample Composite Homogeneity:	Good

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ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: BBMAS-302-1 Lab ID-Version‡: 1340675-1

Sample Layers	Asbestos Content
Gray Baseboard	ND
Tan Baseboard Adhesive	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: BBMAS-302-2 Lab ID-Version‡: 1340674-1

Sample Layers	Asbestos Content
Gray Baseboard	ND
Tan Baseboard Adhesive	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: BBMAS-302-3 Lab ID-Version‡: 1340673-1

Sample Layers	Asbestos Content
Gray Baseboard	ND
Tan Baseboard Adhesive	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: FLUCT-303-1 Lab ID-Version‡: 1340672-1

Sample Layers	Asbestos Content
Gray Tile	ND
Yellow Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: FLUCT-303-2 Lab ID-Version‡: 1340671-1

Sample Layers	Asbestos Content
Gray Tile	ND
Yellow Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

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ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: FLUCT-303-3 Lab ID-Version‡: 1340670-1

Sample Layers	Asbestos Content
Gray Tile	ND
Yellow Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: CLLI-304-1 Lab ID-Version‡: 1340669-1

Sample Layers	Asbestos Content
Beige Ceiling Tile with Paint	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	45% Glass Fibers 40% Cellulose
Sample Composite Homogeneity:	Good

Location: CLLI-304-2 Lab ID-Version‡: 1340668-1

Sample Layers	Asbestos Content
Beige Ceiling Tile with Paint	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	45% Glass Fibers 40% Cellulose
Sample Composite Homogeneity:	Good

Location: CLLI-304-3 Lab ID-Version‡: 1340667-1

Sample Layers	Asbestos Content
Beige Ceiling Tile with Paint	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	45% Glass Fibers 40% Cellulose
Sample Composite Homogeneity:	Good

Location: STSFP-305-1 Lab ID-Version‡: 1340666-1

Sample Layers	Asbestos Content
Beige Fireproofing	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	90% Glass Fibers
Sample Composite Homogeneity:	Good

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ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: STSFP-305-2 Lab ID-Version‡: 1340665-1

Sample Layers	Asbestos Content
Beige Fireproofing	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	90% Glass Fibers
Sample Composite Homogeneity:	Good

Location: STSFP-305-3 Lab ID-Version‡: 1340664-1

Sample Layers	Asbestos Content
Beige Fireproofing	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	90% Glass Fibers
Sample Composite Homogeneity:	Good

Location: STSFP-305-4 Lab ID-Version‡: 1343598-1

Sample Layers	Asbestos Content
Beige Fireproofing	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	90% Glass Fibers
Sample Composite Homogeneity:	Good

Location: STSFP-305-5 Lab ID-Version‡: 1340662-1

Sample Layers	Asbestos Content
Beige Fireproofing	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	90% Glass Fibers
Sample Composite Homogeneity:	Good

Location: STSFP-305-6 Lab ID-Version‡: 1340661-1

Sample Layers	Asbestos Content
Beige Fireproofing	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	90% Glass Fibers
Sample Composite Homogeneity:	Good

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ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: STSFP-305-7 Lab ID-Version‡: 1340660-1

Sample Layers	Asbestos Content
Beige Fireproofing	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	90% Glass Fibers
Sample Composite Homogeneity:	Good

Location: STSFP-305-8 Lab ID-Version‡: 1340659-1

Sample Layers	Asbestos Content
Beige Fireproofing	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	90% Glass Fibers
Sample Composite Homogeneity:	Good

Location: STSFP-305-9(308-9) Lab ID-Version‡: 1340658-1

Sample Layers	Asbestos Content
Beige Fireproofing	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	90% Glass Fibers
Sample Composite Homogeneity:	Good

Comments: Container says STSFP-308-9.

Location: FLCER-306-1 Lab ID-Version‡: 1340657-1

Sample Layers	Asbestos Content
Gray Ceramic Tile	ND
Yellow Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: FLCER-306-2 Lab ID-Version‡: 1340656-1

Sample Layers	Asbestos Content
Gray Ceramic Tile	ND
Yellow Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

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ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: FLCER-306-3 Lab ID-Version‡: 1340655-1

Sample Layers	Asbestos Content
Gray Ceramic Tile	ND
Yellow Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: WLCER-307-1 Lab ID-Version‡: 1340654-1

Sample Layers	Asbestos Content
Gray Ceramic Tile	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: WLCER-307-2 Lab ID-Version‡: 1340653-1

Sample Layers	Asbestos Content
Gray Ceramic Tile	ND
Gray Cementitious Material	ND
Tan Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: WLCER-307-3 Lab ID-Version‡: 1340652-1

Sample Layers	Asbestos Content
Gray Ceramic Tile	ND
Tan Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: WLPL-308-1 Lab ID-Version‡: 1340651-1

Sample Layers	Asbestos Content
Paint	ND
Beige Plaster	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

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ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: WLPL-308-2 Lab ID-Version‡: 1340650-1

Sample Layers	Asbestos Content
Paint	ND
Beige Plaster	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: WLPL-308-3 Lab ID-Version‡: 1340649-1

Sample Layers	Asbestos Content
Paint	ND
Beige Plaster	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: WLPL-308-4 Lab ID-Version‡: 1340648-1

Sample Layers	Asbestos Content
Paint	ND
Beige Plaster	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: BBMAS-309-1 Lab ID-Version‡: 1340647-1

Sample Layers	Asbestos Content
Gray Baseboard	ND
Beige Baseboard Adhesive	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: BBMAS-309-2 Lab ID-Version‡: 1340646-1

Sample Layers	Asbestos Content
Gray Baseboard	ND
Beige Baseboard Adhesive	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

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ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: FLVCT-310-1 Lab ID-Version‡: 1340645-1

Sample Layers	Asbestos Content
Gray Tile	ND
Yellow Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: CLINS-311-1 Lab ID-Version‡: 1340644-1

Sample Layers	Asbestos Content
Gray Fibrous Material	ND
Black Fibrous Material	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	90% Glass Fibers
Sample Composite Homogeneity:	Good

Location: WLPL-312-1 Lab ID-Version‡: 1340643-1

Sample Layers	Asbestos Content
Paint	ND
Beige Plaster	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: WLPL-312-2 Lab ID-Version‡: 1340642-1

Sample Layers	Asbestos Content
Paint	ND
Beige Plaster	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: WLPL-312-3 Lab ID-Version‡: 1340641-1

Sample Layers	Asbestos Content
Paint	ND
Beige Plaster	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

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ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: WLPL-312-4 Lab ID-Version‡: 1340640-1

Sample Layers	Asbestos Content
Paint	ND
Beige Plaster	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: WLPL-312-5 Lab ID-Version‡: 1340639-1

Sample Layers	Asbestos Content
Paint	ND
Beige Plaster	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: WLPL-312-6 Lab ID-Version‡: 1340638-1

Sample Layers	Asbestos Content
Paint	ND
Beige Plaster	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: WLPL-312-7 Lab ID-Version‡: 1340637-1

Sample Layers	Asbestos Content
Paint	ND
Beige Plaster	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: FLUCT-313-1 Lab ID-Version‡: 1340636-1

Sample Layers	Asbestos Content
Blue Tile	ND
Yellow Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

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ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: FLUCT-313-2 Lab ID-Version‡: 1340635-1

Sample Layers	Asbestos Content
Blue Tile	ND
Yellow Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: FLUCT-313-3 Lab ID-Version‡: 1340634-1

Sample Layers	Asbestos Content
Blue Tile	ND
Yellow Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: BBMAS-314-1 Lab ID-Version‡: 1340633-1

Sample Layers	Asbestos Content
Brown Baseboard	ND
Beige Baseboard Adhesive	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: WLPL-203-3 Lab ID-Version‡: 1343642-1

Sample Layers	Asbestos Content
Paint	ND
Beige Plaster	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

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Re: B8452; 720 and 801 E. San Ysidro GSA

Date of Submittal: 06-27-2007
Date of Receipt: 06-28-2007
Date of Report: 07-02-2007

ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Total Samples Submitted:	47
Total Samples Analysed:	45
Total Samples with Composite Asbestos Value > 1%:	1

Location: FLVCT-303-4

Lab ID-Version‡: 1340766-1

Sample Layers	Asbestos Content
Gray Tile	ND
Tan Mastic	ND
Off-White Leveling Compound	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: FLVCT-303-5

Lab ID-Version‡: 1340765-1

Sample Layers	Asbestos Content
Gray Tile	ND
Tan Mastic	ND
Off-White Leveling Compound	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: FLVCT-303-6

Lab ID-Version‡: 1340764-1

Sample Layers	Asbestos Content
Gray Tile	ND
Tan Mastic	ND
Off-White Leveling Compound	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: FLVCT-315-1

Lab ID-Version‡: 1340763-1

Sample Layers	Asbestos Content
Gray Tile	2% Chrysotile
Black Mastic	ND
Composite Asbestos Fibrous Content:	**2% Asbestos**
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Inhomogenous samples are seperated into homogenous subsamples and analyzed individually. ND means no fibers were detected. When detected, the minimum detection and reporting limit is less than 1% unless point counting is performed.
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ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: BBMAS-316-1 Lab ID-Version‡: 1340760-1

Sample Layers	Asbestos Content
Black Baseboard	ND
Brown Baseboard Adhesive	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: BBMAS-316-2 Lab ID-Version‡: 1340759-1

Sample Layers	Asbestos Content
Black Baseboard	ND
Brown Baseboard Adhesive	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: BBMAS-316-3 Lab ID-Version‡: 1340758-1

Sample Layers	Asbestos Content
Black Baseboard	ND
Brown Baseboard Adhesive	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: WLCER-319-1 Lab ID-Version‡: 1340757-1

Sample Layers	Asbestos Content
White Ceramic Tile	ND
Tan Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: WLCER-319-2 Lab ID-Version‡: 1340756-1

Sample Layers	Asbestos Content
White Ceramic Tile	ND
Tan Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

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ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: WLCER-319-3 Lab ID-Version‡: 1340755-1

Sample Layers	Asbestos Content
White Ceramic Tile	ND
Tan Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: BBMAS-320-1 Lab ID-Version‡: 1340754-1

Sample Layers	Asbestos Content
Beige Baseboard	ND
Beige Baseboard Adhesive	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: BBMAS-320-2 Lab ID-Version‡: 1340753-1

Sample Layers	Asbestos Content
Beige Baseboard	ND
Beige Baseboard Adhesive	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: BBMAS-320-3 Lab ID-Version‡: 1340752-1

Sample Layers	Asbestos Content
Beige Baseboard	ND
Beige Baseboard Adhesive	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: CLPL-322-1 Lab ID-Version‡: 1340751-1

Sample Layers	Asbestos Content
Paint	ND
Brown Plaster	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

All samples were received in acceptable condition unless otherwise noted. EMLab P&K reserves the right to dispose of all samples after a period of thirty (30) days, according to all state and federal guidelines, unless otherwise specified.

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ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: CLPL-322-2 Lab ID-Version‡: 1340750-1

Sample Layers	Asbestos Content
Paint	ND
Brown Plaster	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: CLPL-322-3 Lab ID-Version‡: 1340749-1

Sample Layers	Asbestos Content
Paint	ND
Brown Plaster	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: BBMAS-321-1 Lab ID-Version‡: 1340748-1

Sample Layers	Asbestos Content
Brown Baseboard	ND
Beige Baseboard Adhesive	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: STSFP-305-10 Lab ID-Version‡: 1340747-1

Sample Layers	Asbestos Content
Gray Fireproofing	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	90% Glass Fibers 3% Cellulose
Sample Composite Homogeneity:	Good

Location: STSFP-305-11 Lab ID-Version‡: 1340746-1

Sample Layers	Asbestos Content
Gray Fireproofing	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	90% Glass Fibers 3% Cellulose
Sample Composite Homogeneity:	Good

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ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: STSFP-305-12 Lab ID-Version‡: 1340745-1

Sample Layers	Asbestos Content
Gray Fireproofing	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	90% Glass Fibers 3% Cellulose
Sample Composite Homogeneity:	Good

Location: STSFP-305-13 Lab ID-Version‡: 1340744-1

Sample Layers	Asbestos Content
Gray Fireproofing	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	90% Glass Fibers 3% Cellulose
Sample Composite Homogeneity:	Good

Location: STSFP-305-14 Lab ID-Version‡: 1340743-1

Sample Layers	Asbestos Content
Gray Fireproofing	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	90% Glass Fibers 3% Cellulose
Sample Composite Homogeneity:	Good

Location: STSFP-305-15 Lab ID-Version‡: 1340742-1

Sample Layers	Asbestos Content
Gray Fireproofing	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	90% Glass Fibers 3% Cellulose
Sample Composite Homogeneity:	Good

Location: STSFP-305-16 Lab ID-Version‡: 1340741-1

Sample Layers	Asbestos Content
Gray Fireproofing	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	90% Glass Fibers 3% Cellulose
Sample Composite Homogeneity:	Good

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ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: STSFP-305-17 Lab ID-Version‡: 1340740-1

Sample Layers	Asbestos Content
Gray Fireproofing	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	90% Glass Fibers 3% Cellulose
Sample Composite Homogeneity:	Good

Location: STSFP-305-18 Lab ID-Version‡: 1340739-1

Sample Layers	Asbestos Content
Gray Fireproofing	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	90% Glass Fibers 3% Cellulose
Sample Composite Homogeneity:	Good

Location: STSFP-305-19 Lab ID-Version‡: 1340738-1

Sample Layers	Asbestos Content
Gray Fireproofing	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	90% Glass Fibers 3% Cellulose
Sample Composite Homogeneity:	Good

Location: WLSH-317-1 Lab ID-Version‡: 1340737-1

Sample Layers	Asbestos Content
Paint	ND
Off-White Skim Coat	ND
White Drywall	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

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ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: WLSH-317-2 Lab ID-Version‡: 1340736-1

Sample Layers	Asbestos Content
Paint	ND
Off-White Skim Coat	ND
White Drywall	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: WLSH-317-3 Lab ID-Version‡: 1340735-1

Sample Layers	Asbestos Content
Paint	ND
Off-White Skim Coat	ND
White Drywall	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: WLSH-317-4 Lab ID-Version‡: 1340734-1

Sample Layers	Asbestos Content
Paint	ND
Off-White Skim Coat	ND
White Drywall	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: WLSH-317-5 Lab ID-Version‡: 1340733-1

Sample Layers	Asbestos Content
Paint	ND
Off-White Skim Coat	ND
White Drywall	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

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ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: WLSH-317-6 Lab ID-Version‡: 1340732-1

Sample Layers	Asbestos Content
Paint	ND
Off-White Skim Coat	ND
White Drywall	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: WLSH-317-7 Lab ID-Version‡: 1340731-1

Sample Layers	Asbestos Content
Paint	ND
Off-White Skim Coat	ND
White Drywall	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: WLSH-317-8 Lab ID-Version‡: 1340730-1

Sample Layers	Asbestos Content
Paint	ND
Off-White Skim Coat	ND
White Drywall	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: WLSH-317-9 Lab ID-Version‡: 1340729-1

Sample Layers	Asbestos Content
Paint	ND
Off-White Skim Coat	ND
White Drywall	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

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ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: CLPL-318-1 Lab ID-Version‡: 1340728-1

Sample Layers	Asbestos Content
Paint	ND
Brown Plaster	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: CLPL-318-2 Lab ID-Version‡: 1340727-1

Sample Layers	Asbestos Content
Paint	ND
Brown Plaster	ND
Gray Plaster	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: CLPL-318-3 Lab ID-Version‡: 1340726-1

Sample Layers	Asbestos Content
Paint	ND
Brown Plaster	ND
Gray Plaster	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: CLPL-318-4 Lab ID-Version‡: 1340725-1

Sample Layers	Asbestos Content
Paint	ND
Brown Plaster	ND
Gray Plaster	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

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ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: CLPL-318-5 Lab ID-Version‡: 1340724-1

Sample Layers	Asbestos Content
Paint	ND
Brown Plaster	ND
Gray Plaster	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: CLPL-318-6 Lab ID-Version‡: 1340723-1

Sample Layers	Asbestos Content
Paint	ND
Brown Plaster	ND
Gray Plaster	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: CLPL-318-7 Lab ID-Version‡: 1340722-1

Sample Layers	Asbestos Content
Paint	ND
Brown Plaster	ND
Gray Plaster	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: CLPL-318-8 Lab ID-Version‡: 1340721-1

Sample Layers	Asbestos Content
Paint	ND
Brown Plaster	ND
Gray Plaster	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

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ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: CLPL-318-9

Lab ID-Version‡: 1340720-1

Sample Layers	Asbestos Content
Paint	ND
Brown Plaster	ND
Gray Plaster	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

All samples were received in acceptable condition unless otherwise noted. EMLab P&K reserves the right to dispose of all samples after a period of thirty (30) days, according to all state and federal guidelines, unless otherwise specified.

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Re: B8452; 720 and 801 E San Ysidro, ASA, 720 Main, Roof, Exterior and Canopy Soffits

Date of Sampling: 06-28-2007
Date of Receipt: 06-29-2007
Date of Report: 07-03-2007

ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Total Samples Submitted:	13
Total Samples Analysed:	13
Total Samples with Composite Asbestos Value > 1%:	0

Location: Penmas-323-1 Lab ID-Version‡: 1342095-1

Sample Layers	Asbestos Content
Silver Paint	ND
Black Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	35% Cellulose
Sample Composite Homogeneity:	Good

Location: Penmas-323-2 Lab ID-Version‡: 1342096-1

Sample Layers	Asbestos Content
Silver Paint	ND
Black Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	35% Cellulose
Sample Composite Homogeneity:	Good

Location: Penmas-323-3 Lab ID-Version‡: 1342097-1

Sample Layers	Asbestos Content
Silver Paint	ND
Black Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	35% Cellulose
Sample Composite Homogeneity:	Good

Location: Penmas-323-4 Lab ID-Version‡: 1342098-1

Sample Layers	Asbestos Content
Silver Paint	ND
Black Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	35% Cellulose
Sample Composite Homogeneity:	Good

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ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: Penmas-323-5 Lab ID-Version‡: 1342099-1

Sample Layers	Asbestos Content
Silver Paint	ND
Black Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	35% Cellulose
Sample Composite Homogeneity:	Good

Location: Penmas-323-6 Lab ID-Version‡: 1342100-1

Sample Layers	Asbestos Content
Silver Paint	ND
Black Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	35% Cellulose
Sample Composite Homogeneity:	Good

Location: Parmas-324-1 Lab ID-Version‡: 1342101-1

Sample Layers	Asbestos Content
Silver Paint	ND
Black Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	30% Cellulose 10% Glass Fibers
Sample Composite Homogeneity:	Good

Location: Parmas-324-2 Lab ID-Version‡: 1342102-1

Sample Layers	Asbestos Content
Silver Paint	ND
Black Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	30% Cellulose 10% Glass Fibers
Sample Composite Homogeneity:	Good

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ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: Parmas-324-3 Lab ID-Version‡: 1342103-1

Sample Layers	Asbestos Content
Silver Paint	ND
Black Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	30% Cellulose 10% Glass Fibers
Sample Composite Homogeneity:	Good

Location: Parmas-324-4 Lab ID-Version‡: 1342104-1

Sample Layers	Asbestos Content
Silver Paint	ND
Black Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	30% Cellulose 10% Glass Fibers
Sample Composite Homogeneity:	Good

Location: Parmas-324-5 Lab ID-Version‡: 1342105-1

Sample Layers	Asbestos Content
Silver Paint	ND
Black Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	30% Cellulose 10% Glass Fibers
Sample Composite Homogeneity:	Good

Location: Parmas-324-6 Lab ID-Version‡: 1342106-1

Sample Layers	Asbestos Content
Silver Paint	ND
Black Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	30% Cellulose 10% Glass Fibers
Sample Composite Homogeneity:	Good

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Date of Report: 07-03-2007

ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: DHWMUD-325-1

Lab ID-Version‡: 1342107-1

Sample Layers	Asbestos Content
Brown Semi-Fibrous Material	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	40% Glass Fibers
Sample Composite Homogeneity:	Good

Inhomogenous samples are seperated into homogenous subsamples and analyzed individually. ND means no fibers were detected. When detected, the minimum detection and reporting limit is less than 1% unless point counting is performed.
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EMLab P&K
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(650) 829-5800 Fax (650) 829-5852 www.emlab.com

Client: SCA Environmental, Inc.
C/O: Ms. Erica Parks
Re: B8452; 720 and 801 E San Ysidro, ASA, W Mechanical

Date of Sampling: 06-28-2007
Date of Receipt: 06-29-2007
Date of Report: 07-03-2007

ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Total Samples Submitted:	3
Total Samples Analysed:	3
Total Samples with Composite Asbestos Value > 1%:	0

Location: Filter-400-1 Lab ID-Version‡: 1342136-1

Sample Layers	Asbestos Content
Gray Fibrous Material	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	90% Synthetic Fibers 3% Cellulose
Sample Composite Homogeneity:	Good

Location: Filter-400-2 Lab ID-Version‡: 1342137-1

Sample Layers	Asbestos Content
Gray Fibrous Material	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	90% Synthetic Fibers 3% Cellulose
Sample Composite Homogeneity:	Good

Location: Filter-400-3 Lab ID-Version‡: 1342138-1

Sample Layers	Asbestos Content
Blue Fibrous Material	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	90% Synthetic Fibers 3% Cellulose
Sample Composite Homogeneity:	Good

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Client: SCA Environmental, Inc.
C/O: Ms. Erica Parks
Re: B8452; 720 and 801 E San Ysidro, ASA

Date of Sampling: 06-29-2007
Date of Receipt: 07-02-2007
Date of Report: 07-05-2007

ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Total Samples Submitted:	35
Total Samples Analysed:	35
Total Samples with Composite Asbestos Value > 1%:	0

Location: STSFP-500-1 Lab ID-Version‡: 1343928-1

Sample Layers	Asbestos Content
Brown Fireproofing	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	55% Cellulose
Sample Composite Homogeneity:	Good

Location: STSFP-500-2 Lab ID-Version‡: 1343929-1

Sample Layers	Asbestos Content
Brown Fireproofing	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	55% Cellulose
Sample Composite Homogeneity:	Good

Location: STSFP-500-3 Lab ID-Version‡: 1343930-1

Sample Layers	Asbestos Content
Brown Fireproofing	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	55% Cellulose
Sample Composite Homogeneity:	Good

Location: STSFP-500-4 Lab ID-Version‡: 1343931-1

Sample Layers	Asbestos Content
Brown Fireproofing	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	55% Cellulose
Sample Composite Homogeneity:	Good

Location: STSFP-500-5 Lab ID-Version‡: 1343932-1

Sample Layers	Asbestos Content
Brown Fireproofing	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	55% Cellulose
Sample Composite Homogeneity:	Good

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Date of Sampling: 06-29-2007
Date of Receipt: 07-02-2007
Date of Report: 07-05-2007

ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: BBMAS-501-1 Lab ID-Version‡: 1343933-1

Sample Layers	Asbestos Content
Brown Baseboard	ND
Brown Baseboard Adhesive	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: BBMAS-501-2 Lab ID-Version‡: 1343934-1

Sample Layers	Asbestos Content
Brown Baseboard	ND
Brown Baseboard Adhesive	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: BBMAS-501-3 Lab ID-Version‡: 1343935-1

Sample Layers	Asbestos Content
Paint	ND
White Drywall	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	10% Glass Fibers
Sample Composite Homogeneity:	Good

Location: WLSH-502-1 Lab ID-Version‡: 1343936-1

Sample Layers	Asbestos Content
Paint	ND
White Drywall	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	10% Glass Fibers
Sample Composite Homogeneity:	Good

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Date of Sampling: 06-29-2007
Date of Receipt: 07-02-2007
Date of Report: 07-05-2007

ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: WLSH-502-2 Lab ID-Version‡: 1343937-1

Sample Layers	Asbestos Content
Paint	ND
Off-White Skim Coat	ND
White Drywall	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	10% Glass Fibers
Sample Composite Homogeneity:	Good

Location: WLSH-502-3 Lab ID-Version‡: 1343938-1

Sample Layers	Asbestos Content
Paint	ND
Off-White Skim Coat	ND
White Drywall	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	10% Glass Fibers
Sample Composite Homogeneity:	Good

Location: BBMAS-503-1 Lab ID-Version‡: 1343939-1

Sample Layers	Asbestos Content
Dark Brown Baseboard	ND
Yellow Baseboard Adhesive	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: BBMAS-503-2 Lab ID-Version‡: 1343940-1

Sample Layers	Asbestos Content
Dark Brown Baseboard	ND
Yellow Baseboard Adhesive	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

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ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: BBMAS-503-3 Lab ID-Version‡: 1343941-1

Sample Layers	Asbestos Content
Dark Brown Baseboard	ND
Yellow Baseboard Adhesive	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: WLSH-504-1 Lab ID-Version‡: 1343942-1

Sample Layers	Asbestos Content
Paint	ND
White Drywall	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	10% Glass Fibers
Sample Composite Homogeneity:	Good

Location: WLSH-504-2 Lab ID-Version‡: 1343943-1

Sample Layers	Asbestos Content
Paint	ND
White Drywall	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	10% Glass Fibers
Sample Composite Homogeneity:	Good

Location: WLSH-504-3 Lab ID-Version‡: 1343944-1

Sample Layers	Asbestos Content
Paint	ND
White Drywall	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	10% Glass Fibers
Sample Composite Homogeneity:	Good

Location: CLLI-505-1 Lab ID-Version‡: 1343945-1

Sample Layers	Asbestos Content
Beige Ceiling Tile with Paint	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	85% Cellulose 2% Glass Fibers
Sample Composite Homogeneity:	Good

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ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: CLLI-505-2 Lab ID-Version‡: 1343946-1

Sample Layers	Asbestos Content
Beige Ceiling Tile with Paint	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	85% Cellulose 2% Glass Fibers
Sample Composite Homogeneity:	Good

Location: CLLI-505-3 Lab ID-Version‡: 1343947-1

Sample Layers	Asbestos Content
Beige Ceiling Tile with Paint	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	85% Cellulose 2% Glass Fibers
Sample Composite Homogeneity:	Good

Location: WLCER-506-1 Lab ID-Version‡: 1343948-1

Sample Layers	Asbestos Content
White Ceramic Tile	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: WLCER-506-2 Lab ID-Version‡: 1343949-1

Sample Layers	Asbestos Content
White Ceramic Tile	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: WLCER-506-3 Lab ID-Version‡: 1343950-1

Sample Layers	Asbestos Content
White Ceramic Tile	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

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ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: FLCER-507-1 Lab ID-Version‡: 1343951-1

Sample Layers	Asbestos Content
Brown Ceramic Tile	ND
Brown Mastic	ND
Dark Brown Cementitious Material	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: FLCER-507-2 Lab ID-Version‡: 1343952-1

Sample Layers	Asbestos Content
Brown Ceramic Tile	ND
Brown Mastic	ND
Dark Brown Cementitious Material	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: FLCER-507-3 Lab ID-Version‡: 1343953-1

Sample Layers	Asbestos Content
Brown Ceramic Tile	ND
Brown Mastic	ND
Dark Brown Cementitious Material	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: BBMAS-508-1 Lab ID-Version‡: 1343954-1

Sample Layers	Asbestos Content
Gray Baseboard	ND
Tan Baseboard Adhesive	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

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Date of Report: 07-05-2007

ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: BBMAS-508-2 Lab ID-Version‡: 1343955-1

Sample Layers	Asbestos Content
Gray Baseboard	ND
Tan Baseboard Adhesive	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: BBMAS-508-3 Lab ID-Version‡: 1343956-1

Sample Layers	Asbestos Content
Gray Baseboard	ND
Tan Baseboard Adhesive	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: FLVCT-509-1 Lab ID-Version‡: 1343957-1

Sample Layers	Asbestos Content
Beige Tile	ND
Yellow Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: FLVCT-509-2 Lab ID-Version‡: 1343958-1

Sample Layers	Asbestos Content
Beige Tile	ND
Yellow Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: FLVCT-509-3 Lab ID-Version‡: 1343959-1

Sample Layers	Asbestos Content
Beige Tile	ND
Yellow Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

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Date of Sampling: 06-29-2007
Date of Receipt: 07-02-2007
Date of Report: 07-05-2007

ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: CLPL-510-1 Lab ID-Version‡: 1343960-1

Sample Layers	Asbestos Content
Paint	ND
Brown Plaster	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	2% Glass Fibers
Sample Composite Homogeneity:	Good

Location: CLPL-510-2 Lab ID-Version‡: 1343961-1

Sample Layers	Asbestos Content
Paint	ND
Brown Plaster	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	2% Glass Fibers
Sample Composite Homogeneity:	Good

Location: CLPL-510-3 Lab ID-Version‡: 1343962-1

Sample Layers	Asbestos Content
Paint	ND
Brown Plaster	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	2% Glass Fibers
Sample Composite Homogeneity:	Good

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C/O: Ms. Erica Parks
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Date of Sampling: 06-29-2007
Date of Receipt: 07-02-2007
Date of Report: 07-06-2007

ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Total Samples Submitted:	40
Total Samples Analysed:	38
Total Samples with Composite Asbestos Value > 1%:	1

Location: WLSH-600-1

Lab ID-Version‡: 1344135-1

Sample Layers	Asbestos Content
White Drywall	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	10% Glass Fibers
Sample Composite Homogeneity:	Good

Location: WLSH-600-2

Lab ID-Version‡: 1344136-1

Sample Layers	Asbestos Content
Paint	ND
Off-White Skim Coat	ND
White Drywall	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	10% Glass Fibers
Sample Composite Homogeneity:	Good

Location: WLSH-600-3

Lab ID-Version‡: 1344137-1

Sample Layers	Asbestos Content
Paint	ND
Off-White Skim Coat	ND
White Drywall	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	10% Glass Fibers
Sample Composite Homogeneity:	Good

Location: FLVCT-601-1

Lab ID-Version‡: 1344138-1

Sample Layers	Asbestos Content
Gray Tile	ND
Yellow Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

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ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: FLVCT-601-2 Lab ID-Version‡: 1344139-1

Sample Layers	Asbestos Content
Gray Tile	ND
Yellow Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: FLVCT-601-3 Lab ID-Version‡: 1344140-1

Sample Layers	Asbestos Content
Gray Tile	ND
Yellow Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: BBMAS-602-1 Lab ID-Version‡: 1344141-1

Sample Layers	Asbestos Content
Gray Baseboard	ND
Tan Baseboard Adhesive	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: BBMAS-602-2 Lab ID-Version‡: 1344142-1

Sample Layers	Asbestos Content
Gray Baseboard	ND
Tan Baseboard Adhesive	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: BBMAS-602-3 Lab ID-Version‡: 1344143-1

Sample Layers	Asbestos Content
Gray Baseboard	ND
Tan Baseboard Adhesive	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

All samples were received in acceptable condition unless otherwise noted. EMLab P&K reserves the right to dispose of all samples after a period of thirty (30) days, according to all state and federal guidelines, unless otherwise specified.

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ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: BBMAS-603-1 Lab ID-Version‡: 1344144-1

Sample Layers	Asbestos Content
Gray Baseboard	ND
Off-White Baseboard Adhesive	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: BBMAS-603-2 Lab ID-Version‡: 1344145-1

Sample Layers	Asbestos Content
Gray Baseboard	ND
Off-White Baseboard Adhesive	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: BBMAS-603-3 Lab ID-Version‡: 1344146-1

Sample Layers	Asbestos Content
Gray Baseboard	ND
Off-White Baseboard Adhesive	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: STSFP-605-1 Lab ID-Version‡: 1344147-1

Sample Layers	Asbestos Content
Brown Fireproofing	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	90% Glass Fibers 2% Cellulose
Sample Composite Homogeneity:	Good

Location: STSFP-605-2 Lab ID-Version‡: 1344148-1

Sample Layers	Asbestos Content
Brown Fireproofing	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	90% Glass Fibers 2% Cellulose
Sample Composite Homogeneity:	Good

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ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: STSFP-605-3 Lab ID-Version‡: 1344149-1

Sample Layers	Asbestos Content
Brown Fireproofing	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	90% Glass Fibers 2% Cellulose
Sample Composite Homogeneity:	Good

Location: STSFP-605-4 Lab ID-Version‡: 1344150-1

Sample Layers	Asbestos Content
Brown Fireproofing	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	90% Glass Fibers 2% Cellulose
Sample Composite Homogeneity:	Good

Location: STSFP-605-5 Lab ID-Version‡: 1344151-1

Sample Layers	Asbestos Content
Brown Fireproofing	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	90% Glass Fibers 2% Cellulose
Sample Composite Homogeneity:	Good

Location: STSFP-605-6 Lab ID-Version‡: 1344152-1

Sample Layers	Asbestos Content
Brown Fireproofing	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	90% Glass Fibers 2% Cellulose
Sample Composite Homogeneity:	Good

Location: STSFP-605-7 Lab ID-Version‡: 1344153-1

Sample Layers	Asbestos Content
Brown Fireproofing	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	90% Glass Fibers 2% Cellulose
Sample Composite Homogeneity:	Good

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EMLab P&K
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(650) 829-5800 Fax (650) 829-5852 www.emlab.com

Client: SCA Environmental, Inc.
C/O: Ms. Erica Parks
Re: B8452; 720 and 801 E San Ysidro, ASA

Date of Sampling: 06-29-2007
Date of Receipt: 07-02-2007
Date of Report: 07-06-2007

ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: CLLI-604-1 Lab ID-Version‡: 1344154-1

Sample Layers	Asbestos Content
Beige Ceiling Tile with Paint	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	90% Cellulose 3% Glass Fibers
Sample Composite Homogeneity:	Good

Location: CLLI-604-2 Lab ID-Version‡: 1344155-1

Sample Layers	Asbestos Content
Beige Ceiling Tile with Paint	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	90% Cellulose 3% Glass Fibers
Sample Composite Homogeneity:	Good

Location: CLLI-604-3 Lab ID-Version‡: 1344156-1

Sample Layers	Asbestos Content
Beige Ceiling Tile with Paint	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	90% Cellulose 3% Glass Fibers
Sample Composite Homogeneity:	Good

Location: FLCER-606-1 Lab ID-Version‡: 1344157-1

Sample Layers	Asbestos Content
Gray Ceramic Tile	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: FLCER-606-2 Lab ID-Version‡: 1344158-1

Sample Layers	Asbestos Content
Gray Ceramic Tile	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

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ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: FLCER-606-3 Lab ID-Version‡: 1344159-1

Sample Layers	Asbestos Content
Off-White Mastic	ND
Gray Ceramic Tile	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: WLCER-607-1 Lab ID-Version‡: 1344160-1

Sample Layers	Asbestos Content
Off-White Ceramic Tile	ND
Gray Cementitious Material	ND
Beige Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: WLCER-607-2 Lab ID-Version‡: 1344161-1

Sample Layers	Asbestos Content
Off-White Ceramic Tile	ND
Gray Cementitious Material	ND
Beige Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: WLCER-607-3 Lab ID-Version‡: 1344162-1

Sample Layers	Asbestos Content
Off-White Ceramic Tile	ND
Gray Cementitious Material	ND
Beige Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

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Date of Sampling: 06-29-2007
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ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: CLPL-608-1 Lab ID-Version‡: 1344163-1

Sample Layers	Asbestos Content
Paint	ND
Brown Plaster	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	< 1% Glass Fibers
Sample Composite Homogeneity:	Good

Location: CLPL-608-2 Lab ID-Version‡: 1344164-1

Sample Layers	Asbestos Content
Paint	ND
Brown Plaster	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	< 1% Glass Fibers
Sample Composite Homogeneity:	Good

Location: CLPL-608-3 Lab ID-Version‡: 1344165-1

Sample Layers	Asbestos Content
Paint	ND
Brown Plaster	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	< 1% Glass Fibers
Sample Composite Homogeneity:	Good

Location: FLVCT-609-1 Lab ID-Version‡: 1344166-1

Sample Layers	Asbestos Content
Brown Tile	ND
Yellow Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: FLVCT-609-2 Lab ID-Version‡: 1344167-1

Sample Layers	Asbestos Content
Brown Tile	ND
Yellow Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

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ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: FLVCT-609-3 Lab ID-Version‡: 1344168-1

Sample Layers	Asbestos Content
Brown Tile	ND
Yellow Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: BBMAS-610-1 Lab ID-Version‡: 1344169-1

Sample Layers	Asbestos Content
Dark Brown Baseboard	ND
Off-White Baseboard Adhesive	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: BBMAS-610-2 Lab ID-Version‡: 1344170-1

Sample Layers	Asbestos Content
Dark Brown Baseboard	ND
Off-White Baseboard Adhesive	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: BBMAS-610-3 Lab ID-Version‡: 1344171-1

Sample Layers	Asbestos Content
Dark Brown Baseboard	ND
Off-White Baseboard Adhesive	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

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Date of Receipt: 07-02-2007
Date of Report: 07-06-2007

ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: WLPL-611-1

Lab ID-Version‡: 1344172-1

Sample Layers	Asbestos Content
Paint	ND
White Plaster	ND
Beige Plaster	2% Chrysotile
Composite Asbestos Fibrous Content:	**2% Asbestos**
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

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Client: SCA Environmental, Inc.
C/O: Ms. Erica Parks
Re: B8452; 720 and 801 E San Ysidro, ASA, 2nd Inspection East

Date of Sampling: 06-28-2007
Date of Receipt: 06-29-2007
Date of Report: 07-03-2007

ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Total Samples Submitted:	15
Total Samples Analysed:	15
Total Samples with Composite Asbestos Value > 1%:	0

Location: Stucco-700-1 Lab ID-Version‡: 1342064-1

Sample Layers	Asbestos Content
Paint	ND
Brown Stucco	ND
Gray Stucco	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: Stucco-700-2 Lab ID-Version‡: 1342065-1

Sample Layers	Asbestos Content
Paint	ND
Brown Stucco	ND
Gray Stucco	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: Stucco-700-3 Lab ID-Version‡: 1342066-1

Sample Layers	Asbestos Content
Paint	ND
Brown Stucco	ND
Gray Stucco	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

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ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: WLSH-701-1 Lab ID-Version‡: 1342067-1

Sample Layers	Asbestos Content
Off-White Skim Coat	ND
Tape	ND
Off-White Joint Compound	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	20% Cellulose
Sample Composite Homogeneity:	Good

Location: WLSH-701-2 Lab ID-Version‡: 1342068-1

Sample Layers	Asbestos Content
Off-White Skim Coat	ND
Pink Drywall	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	5% Glass Fibers
Sample Composite Homogeneity:	Good

Location: WLSH-701-3 Lab ID-Version‡: 1342069-1

Sample Layers	Asbestos Content
Off-White Skim Coat	ND
Pink Drywall	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	5% Glass Fibers
Sample Composite Homogeneity:	Good

Location: FLVCT-702-1 Lab ID-Version‡: 1342070-1

Sample Layers	Asbestos Content
Blue Tile	ND
Yellow Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

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Date of Receipt: 06-29-2007
Date of Report: 07-03-2007

ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: FLVCT-702-2 Lab ID-Version‡: 1342071-1

Sample Layers	Asbestos Content
Blue Tile	ND
Yellow Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: FLVCT-702-3 Lab ID-Version‡: 1342072-1

Sample Layers	Asbestos Content
Blue Tile	ND
Yellow Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: BBMAS-703-1 Lab ID-Version‡: 1342073-1

Sample Layers	Asbestos Content
Blue Baseboard	ND
Off-White Baseboard Adhesive	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: BBMAS-703-2 Lab ID-Version‡: 1342074-1

Sample Layers	Asbestos Content
Blue Baseboard	ND
Off-White Baseboard Adhesive	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

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Date of Receipt: 06-29-2007
Date of Report: 07-03-2007

ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: BBMAS-703-3 Lab ID-Version‡: 1342075-1

Sample Layers	Asbestos Content
Blue Baseboard	ND
Off-White Baseboard Adhesive	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: CLLI-704-1 Lab ID-Version‡: 1342076-1

Sample Layers	Asbestos Content
Beige Ceiling Tile with Paint	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	45% Glass Fibers 40% Cellulose
Sample Composite Homogeneity:	Good

Location: CLLI-704-2 Lab ID-Version‡: 1342077-1

Sample Layers	Asbestos Content
Beige Ceiling Tile with Paint	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	45% Glass Fibers 40% Cellulose
Sample Composite Homogeneity:	Good

Location: CLLI-704-3 Lab ID-Version‡: 1342078-1

Sample Layers	Asbestos Content
Beige Ceiling Tile with Paint	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	45% Glass Fibers 40% Cellulose
Sample Composite Homogeneity:	Good

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Date of Sampling: 06-28-2007
Date of Receipt: 06-29-2007
Date of Report: 07-03-2007

ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Total Samples Submitted:	15
Total Samples Analysed:	15
Total Samples with Composite Asbestos Value > 1%:	0

Location: Stucco-800-1 Lab ID-Version‡: 1342008-1

Sample Layers	Asbestos Content
Paint	ND
Brown Stucco	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: Stucco-800-2 Lab ID-Version‡: 1342009-1

Sample Layers	Asbestos Content
Paint	ND
Brown Stucco	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: Stucco-800-3 Lab ID-Version‡: 1342010-1

Sample Layers	Asbestos Content
Paint	ND
Brown Stucco	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: FLVCT-801-1 Lab ID-Version‡: 1342011-1

Sample Layers	Asbestos Content
Gray Tile	ND
Yellow Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

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ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: FLVCT-801-2 Lab ID-Version‡: 1342012-1

Sample Layers	Asbestos Content
Gray Tile	ND
Yellow Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: FLVCT-801-3 Lab ID-Version‡: 1342013-1

Sample Layers	Asbestos Content
Gray Tile	ND
Yellow Mastic	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: BBMAS-802-1 Lab ID-Version‡: 1342014-1

Sample Layers	Asbestos Content
Gray Baseboard	ND
Off-White Baseboard Adhesive	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: BBMAS-802-2 Lab ID-Version‡: 1342015-1

Sample Layers	Asbestos Content
Gray Baseboard	ND
Off-White Baseboard Adhesive	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

Location: BBMAS-802-3 Lab ID-Version‡: 1342016-1

Sample Layers	Asbestos Content
Gray Baseboard	ND
Off-White Baseboard Adhesive	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	ND
Sample Composite Homogeneity:	Good

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ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: WLSH-803-1 Lab ID-Version‡: 1342017-1

Sample Layers	Asbestos Content
Paint	ND
White Drywall	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	10% Glass Fibers
Sample Composite Homogeneity:	Good

Location: WLSH-803-2 Lab ID-Version‡: 1342018-1

Sample Layers	Asbestos Content
Paint	ND
White Drywall	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	10% Glass Fibers
Sample Composite Homogeneity:	Good

Location: WLSH-803-3 Lab ID-Version‡: 1342019-1

Sample Layers	Asbestos Content
Paint	ND
White Drywall	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	10% Glass Fibers
Sample Composite Homogeneity:	Good

Location: CLLI-804-1 Lab ID-Version‡: 1342020-1

Sample Layers	Asbestos Content
Beige Ceiling Tile with Paint	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	45% Glass Fibers 40% Cellulose
Sample Composite Homogeneity:	Good

Location: CLLI-804-2 Lab ID-Version‡: 1342021-1

Sample Layers	Asbestos Content
Beige Ceiling Tile with Paint	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	45% Glass Fibers 40% Cellulose
Sample Composite Homogeneity:	Good

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ASBESTOS PLM REPORT: EPA METHOD 600/R-93-116

Location: CLLI-804-3

Lab ID-Version‡: 1342022-1

Sample Layers	Asbestos Content
Beige Ceiling Tile with Paint	ND
Composite Asbestos Fibrous Content:	ND
Composite Non-Asbestos Fibrous Content:	45% Glass Fibers 40% Cellulose
Sample Composite Homogeneity:	Good

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ALSF ANALYTICAL LABS SAN FRANCISCO INC.

POLARIZED LIGHT MICROSCOPY ANALYSIS FOR ASBESTOS CONTENT

Client: SCA ENVIRONMENTAL, INC.
334 19TH STREET
OAKLAND, CA 94612

Report Number: UG1805
Date: JULY 19-20, 2007
Analyst: OLGA KIST
Date Analyzed: JULY 19-20, 2007
Sample Collector: ERICA PARKS
Collection Date: JULY 17, 2007

Project No.: B8452
Project Name: GSIA SAN YSIDRO SURVEY

8 Sample(s) containing Asbestos

38 Sample(s) Analyzed
38 Sample(s) Received 7/18/07 12:40

Sample #	Location / Description	ASBESTOS Type and %	NONASBESTOS Other Fibers (%) Balance
9. WLSH-119-1	A) YELLOW GLUE	NONE DETECTED	GYPSUM, SILI, CARB, SYN, BINDER, MICA, MISC.
	B) WHITE PAINT	NONE DETECTED	
	C) WHITE COMPOUND	NONE DETECTED	CELL, SYN <1
	D) OFF-WHITE PLASTER	NONE DETECTED	
10. STUCCO-100-1	A) OFF-WHITE PAINT	NONE DETECTED	SILI, CARB, PERLITE, SYN, MISC.
	B) OFF-WHITE TEXTURE COMPOUND	NONE DETECTED	CELL, GL 2-5
	C) GRAY PLASTER	NONE DETECTED	
11. PUTTY-101-1	A) BROWN/BLACK PAINT	NONE DETECTED	CARB, SILI, BINDER, SYN, MISC.
	B) TAN PUTTY	**CHRYS 2-5**	
12. WLSH-102-1	A) OFF-WHITE PAINT	NONE DETECTED	CELL 10-20 / GYPSUM, CARB, SILI, SYN, MISC.
	B) WHITE SHEETROCK	NONE DETECTED	
13. WLSH-200-1	A) OFF-WHITE PAINT	NONE DETECTED	CELL, GL 10-20 / GYPSUM, CARB, MICA, SYN, MISC.
	B) WHITE SHEETROCK	NONE DETECTED	
14. STSFP-305-1	TAN MINERAL WOOL INSULATION	NONE DETECTED	GL 50-60, ARAGONITE 1-3 / CARB, MISC.
15. WLPL-308-1	A) OFF-WHITE PAINT	NONE DETECTED	SILI, CARB, MICA, MISC.
	B) WHITE COARSE FINISHING PLASTER	NONE DETECTED	POLY, GL 1-3
	C) GRAY PLASTER	NONE DETECTED	CELL, GL <1
16. WLPL-312-1	A) WHITE PAINT	NONE DETECTED	SILI, GYPSUM, SYN, MISC.
	B) WHITE COARSE PLASTER	NONE DETECTED	CELL, GL <1

See Bldg CA0581; 801 E. San Ysidro

ASBESTOS TYPES

CHRYS: Chrysotile
AMOS: Amosite
CROC: Crocidolite
TREM: Tremolite/Actinolite
ANTH: Anthophyllite

NONASBESTOS

CELL: Cellulose
GL: Fiberglass/Mineral Wool
SYN: Synthetic
CARB: Carbonates
SILI: Mixed Silicates
POLY: Polyethylene
FTALC: Fibrous Talc
FGYP: Fibrous Gypsum
FELD: Feldspar
CASI: Calcium Silicates

Bulk samples analyzed in accordance with "Method for the Determination of Asbestos in Bulk Building Materials" EPA/600/R-93/116, July 1993. The detection limit is 1%. Quantitation of asbestos is by calibrated visual estimation. Analytical Labs San Francisco, Inc. (ALSF) is recognized under the National Laboratory Accreditation Program for satisfactory compliance with criteria established in Title 15, Part 7 code of Federal Regulations and accredited for bulk asbestos fiber analysis (NVLAP lab code: 101909-0). Asbestos fibers less than 0.2 microns cannot be resolved by light microscope. This report must not be reproduced except in full, without the written approval of ALSF and pertains only to the samples analyzed.

AUTHORIZED SIGNATURE_____ DATE _____

487 Potrero Avenue, San Francisco, CA 94110 (415) 552-4595 FAX 552-0730

ALSF ANALYTICAL LABS SAN FRANCISCO INC.

POLARIZED LIGHT MICROSCOPY ANALYSIS FOR ASBESTOS CONTENT

Client: SCA ENVIRONMENTAL, INC.
334 19TH STREET
OAKLAND, CA 94612

Report Number: UG1805
Date: JULY 19-20, 2007
Analyst: OLGA KIST
Date Analyzed: JULY 19-20, 2007
Sample Collector: ERICA PARKS
Collection Date: JULY 17, 2007

Project No.: B8452
Project Name: GSIA SAN YSIDRO SURVEY

8 Sample(s) containing Asbestos

38 Sample(s) Analyzed
38 Sample(s) Received 7/18/07 12:40

Sample #	Location / Description	ASBESTOS Type and %	NONASBESTOS Other Fibers (%) Balance
17. FLVCT-313-1	A) BLUE TILE	NONE DETECTED	SYN, CARB, BINDERS, MISC.
	B) GOLD-GRAY GLUE/LEVELING	NONE DETECTED	
18. CLPL-322-1	A) OFF-WHITE PAINT	NONE DETECTED	SILI, GYPSUM, SYN, MISC.
	B) OFF-WHITE COARSE PLASTER	NONE DETECTED	POLY -1-2
19. PENMAS-323-1	A) SILVER PAINT	NONE DETECTED	ASPHALT, PERLITE, METAL FLAKES, MISC.
	B) GRAY PAINT	NONE DETECTED	
	C) BLACK TAR	NONE DETECTED	CELL, GL 20-30
20. PARMAS-324-1	A) SILVER PAINT	NONE DETECTED	ASPHALT, PERLITE, METAL FLAKES, MISC.
	B) BLACK TAR	NONE DETECTED	CELL, GL 20-30
21. DHWMUD-325-1	A) GRAY GLUE WITH PAPER FELT	NONE DETECTED	CELL 60-70 / DIATOMITE, BINDER, MISC.
	B) OFF-WHITE COTTON STRANDS	NONE DETECTED	CELL 80-90
	C) OFF-WHITE INSULATION	NONE DETECTED	GL 20-30
22. STSFP-500-1	OFF-WHITE FIREPROOFING	NONE DETECTED	CELL 10-20 / VERMICULITE, GYPSUM, MISC.
23. WLSH-502-1	A) OFF-WHITE PAINT	NONE DETECTED	CELL, GL 20-30 / GYPSUM, CARB, SYN, MISC.
	B) OFF-WHITE COMPOUND (SKIM)	NONE DETECTED	
	C) WHITE SHEETROCK	NONE DETECTED	
24. WLSH-504-1	A) OFF-WHITE PAINT	NONE DETECTED	CELL, GL 20-30 / GYPSUM, CARB, SYN, MISC.
	B) WHITE SHEETROCK	NONE DETECTED	

ASBESTOS TYPES

CHRYS: Chrysotile
AMOS: Amosite
CROC: Crocidolite
TREM: Tremolite/Actinolite
ANTH: Anthophyllite

NONASBESTOS

CELL: Cellulose
GL: Fiberglass/Mineral Wool
SYN: Synthetic
CARB: Carbonates
SILI: Mixed Silicates
POLY: Polyethylene
FTALC: Fibrous Talc
FGYP: Fibrous Gypsum
FELD: Feldspar
CASI: Calcium Silicates

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AUTHORIZED SIGNATURE (b)(6) illegible signature DATE 7/23/07

ALSF ANALYTICAL LABS SAN FRANCISCO INC.

POLARIZED LIGHT MICROSCOPY ANALYSIS FOR ASBESTOS CONTENT

Client: SCA ENVIRONMENTAL, INC.
334 19TH STREET
OAKLAND, CA 94612

Project No.: B8452
Project Name: GSIA SAN YSIDRO SURVEY

Report Number: UG1805
Date: JULY 19-20, 2007
Analyst: OLGA KIST
Date Analyzed: JULY 19-20, 2007
Sample Collector: ERICA PARKS
Collection Date: JULY 17, 2007
8 Sample(s) containing Asbestos

38 Sample(s) Analyzed
38 Sample(s) Received 7/18/07 12:40

Sample #	Location / Description	ASBESTOS Type and %	NONASBESTOS Other Fibers (%) Balance
25. FLVCT-509-1	A) OFF-WHITE-BEIGE TILE	NONE DETECTED	SYN, CARB, SILI, FLYASH, OPAQUES, MISC.
	B) BLACK RUBBERY GLUE	NONE DETECTED	
	C) GRAY GLUE AND LEVELING	NONE DETECTED	CELL 1-3, GL <1
	D) GRAY-BLACK CONCRETE (EDGE)	NONE DETECTED	GL <1
26. CLPL-510-1	A) OFF-WHITE COATING	NONE DETECTED	CASI, SYN, GL 1-2 / SILI, SYN, CARB, FLYASH, MISC.
	B) GRAY LIGHTWEIGHT CONCRETE WITH FOAM	NONE DETECTED	CASI, GL 1-3
	C) BLUE LOOSE FIBERGLASS WITH PLASTIC	NONE DETECTED	GL 70-80
27. CLPL-608-1	A) OFF-WHITE COATING	NONE DETECTED	SYN, CASI 1-3 / SILI, SYN, CARB, FLYASH, MISC.
	B) GRAY LIGHTWEIGHT CONCRETE WITH FOAM	NONE DETECTED	CASI, GL 1-3
	C) BLUE LOOSE FIBERGLASS WITH PLASTIC	NONE DETECTED	GL 70-80
28. FLVCT-609-1	A) OFF-WHITE-BEIGE TILE	NONE DETECTED	SYN, CARB, BINDER, MISC.
	B) YELLOW GLUE	NONE DETECTED	
29. STSFP-605-1	TAN MINERAL WOOL INSULATION W/ WHITE SPRAY COATING	NONE DETECTED	GL 50-60, CELL <1, ARAGONITE <1-3 / CARB, GYPSUM, SYN, MISC.
30. WLSH-600-1	A) OFF-WHITE PAINT	NONE DETECTED	CELL, GL 10-20 / GYPSUM, CARB, PERLITE,
	B) WHITE COMPOUND (SKIM)	NONE DETECTED	SYN, MISC.
	C) WHITE SHEETROCK	NONE DETECTED	
31. WLPL-611-1	A) OFF-WHITE PAINT	NONE DETECTED	SILI, GYPSUM, SYN, MICA, MISC.
	B) WHITE FINISHING PLASTER	NONE DETECTED	
	C) OFF-WHITE COARSE PLASTER	NONE DETECTED	

ASBESTOS TYPES
CHRYS: Chrysotile
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ANTH: Anthophyllite

NONASBESTOS
CELL: Cellulose
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SILI: Mixed Silicates
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DATE 7/23/07

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ALSF ANALYTICAL LABS SAN FRANCISCO INC.

POLARIZED LIGHT MICROSCOPY ANALYSIS FOR ASBESTOS CONTENT

Client: SCA ENVIRONMENTAL, INC.
334 19TH STREET
OAKLAND, CA 94612

Project No.: B8452
Project Name: GSIA SAN YSIDRO SURVEY

Report Number: UG1805
Date: JULY 19-20, 2007
Analyst: OLGA KIST
Date Analyzed: JULY 19-20, 2007
Sample Collector: ERICA PARKS
Collection Date: JULY 17, 2007
8 Sample(s) containing Asbestos

38 Sample(s) Analyzed
38 Sample(s) Received 7/18/07 12:40

Sample #	Location / Description	ASBESTOS Type and %	NONASBESTOS Other Fibers (%) Balance
32. WLPL-611-2	A) OFF-WHITE PAINT	NONE DETECTED	GYPSUM, SILI, MICA, SYN, MISC.
	B) WHITE FINISHING PLASTER	NONE DETECTED	
	C) OFF-WHITE FIREPROOFING PLASTER	**CHRYS 1-3**	
33. WLPL-611-3	A) OFF-WHITE PAINT	NONE DETECTED	SILI, GYPSUM, SYN, MICA, MISC.
	B) WHITE FINISHING PLASTER	NONE DETECTED	
	C) LOOSE OFF-WHITE COARSE PLASTER	NONE DETECTED	SYN, CELL <1
34. STUCCO-700-1	A) OFF-WHITE COATING	NONE DETECTED	CASI <1, SYN <1, POLY <1 / SILI, SYN, CARB, MISC.
	B) GRAY LIGHT WOOL CONCRETE	NONE DETECTED	CASI 1-3
35. FLVCT-702-1	A) BLUE TILE	NONE DETECTED	SYN, CARB, BINDER, FLYASH, MISC.
	B) YELLOW GLUE WITH LEVELING	NONE DETECTED	
36. STUCCO-800-1	A) OFF-WHITE COATING	NONE DETECTED	SYN <1-2, CASI <1 / SILI, SYN, MISC.
	B) OFF-WHITE CAULK WITH BLACK DEBRIS	NONE DETECTED	GL <1
37. FLVCT-801-1	A) GRAY TILE	NONE DETECTED	SYN, CARB, BINDER, MISC.
	B) CLEAR-BROWN GLUES	NONE DETECTED	
38. WLSH-803-1	A) OFF-WHITE PAINT	NONE DETECTED	CELL, GL 10-20 / GYPSUM, CARB, SYN, MISC.
	B) WHITE SHEETROCK	NONE DETECTED	
071607	LABORATORY BLANK (1866 GLASS FIBERS)	NONE DETECTED	

ASBESTOS TYPES
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NONASBESTOS
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ALSF ANALYTICAL LABS SAN FRANCISCO INC.

POLARIZED LIGHT MICROSCOPY ANALYSIS FOR ASBESTOS CONTENT

Client: SCA ENVIRONMENTAL, INC.
334 19TH STREET
OAKLAND, CA 94612

Project No.: B8452
Project Name: GSIA SAN YSIDRO SURVEY

Report Number: UG1805S
Date: JULY 23, 2007
Analyst: OLGA KIST
Date Analyzed: JULY 23, 2007
Sample Collector: ERICA PARKS
Collection Date: JULY 17, 2007
1 Sample(s) containing Asbestos
SUPPLEMENTAL REPORT TO UG1805

2 Sample(s) Analyzed
38 Sample(s) Received 7/18/07 12:40

Sample #	Location / Description	ASBESTOS Type and %	NONASBESTOS Other Fibers (%) Balance
11. PUTTY-101-1	A) BROWN PAINT	NONE DETECTED	CARB, SILI, BINDER, SYN, MISC.
	B) OFF-WHITE-GOLD PUTTY WITH BLACK PAINT	**CHRYS 1-3**	CELL, GL <1
31. WLPL-611-1	A) WHITE PAINT	NONE DETECTED	GYPSUM, SILI, IRON OXIDES, MICA, SYN, CARB, MISC.
	B) WHITE FINISHING PLASTER	NONE DETECTED	FTALC <1
	C) TAN COARSE PLASTER	NONE DETECTED	
072307	LABORATORY BLANK (1866 GLASS FIBERS)	NONE DETECTED	

ASBESTOS TYPES

CHRYS: Chrysotile
AMOS: Amosite
CROC: Crocidolite
TREM: Tremolite/Actinolite
ANTH: Anthophyllite

NONASBESTOS

CELL: Cellulose
GL: Fiberglass/Mineral Wool
SYN: Synthetic
CARB: Carbonates
SILI: Mixed Silicates
POLY: Polyethylene
FTALC: Fibrous Talc
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AUTHORIZED SIGNATURE (b)(6) illegible signature

DATE 7/24/07

467 Potrero Avenue, San Francisco, CA 94110 (415) 552-4595 FAX 552-0730

Attachment 2

Field Data Sheets

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB
								35x15	6x160	115x6 ✓								80x5	7x7	✱		45x15	30x40 ✓(12)	10x12	8x20	11x11	30x15	10x12
1	720 E San Ysidro - MAIN BUILDING, EXTERIOR & ROOFS							MAIN - FIRST FLOOR																				
	1	2	3	4	5	Material ID	Material Description	BREAK	CORR 1	CORR 2	CUST	ELEC 1	ELEC 2	HOLD 1	HOLD 2	HOLD 3	HOLD 3	HOLD4	LOCKER 1	LOCKER 2	OFFICE 1	OFFICE 2	OFFICE 3	OFFICE 4	OFFICE 5	OFFICE 6	OFFICE 7	OFFICE 8
3	Known	ACM				STSFP - 300	Known residual ACM structural fireproofing. Most abated 1990's - remaining STSFP encapsulated	PNQ																				
P 4	√	√	√	√	√	WLSH - 301	Textured painted drywall & tape on Main Bldg First floor throughout & some ceilings	1500	350 x 15	2300 ✗								360 x 5	28 x 15	20		350 x 15	140 x 5 (x2)	44 x 15	30 x 15	44 x 15	210 x 15	120 + 440
5	√	√	√			BBMAS - 302	4" light gray vinyl base throughout & mastic		350	250 LF	40												200				150	44
6	√	√	√			FLVCT - 303	12 x 12 light gray w/beige and gray streaks VCT throughout & mastic & leveling cpd	35x15		600 ✗									7x7							11x11	700	120
7	√	√	√			CLLI - 304	2x4 white w/ fissures & skipples laid-in tile	35x15	6x160	600 ✗	60								7x7			45x15	30x40 (x2)	120	16x20	11x11	700	
P 8	√	√	√	√	√	STSFP - 305	New STSFP (gray) on beams & decking throughout	35x15	6x160	600 ✗	60			80x15	20x15		72x15	80x5	7x7			45x15	30x40 (x2)	120	16x20	11x11	700	120
P 9	√	√	/			FLCER - 306	1.5 x 1.5 light gray ceramic floor tile & grout in men/women & grout																					
P 10	√	√	/			WLCER - 307	6 to 20 4x4 white ceramic wall tile & grout above & grout																					
P 11	√	√	√			WLPL - 308	Hard top textured ceiling plaster on lath in holding cells											80 x 5	28									
P 12	√	√				BBMAS - 309	4" dark gray/green vinyl base + mastic	100														200	100 (x2)	44	(44 x 15) 440	44	60	
P 13	√					FLVCT - 310	12 x 12 ~~beige~~ med/dark gray w/ beige & gray streaks patch of newer VCT + mastic																				90	
P 14	√					CLINS - 311	Gray felt insulation above aluminum ceiling slats (accessible only from an area w/a broken slat)																					
P 15	√	√	√	√	√	WLPL - 312	Textured Wall plaster skim coat & rough sandy plaster layer on lath & concrete				80 x 10														30 x 15			
P 16	√	√	√			FLVCT - 313	12 x 12 alternating light & dark gray/green VCT & mastic		6x160													45x15	30x4 (x2)	120				
P 17	√					BBMAS - 314	4" red/brown vinyl base & mastic				10														60			
18	√					FLVCT - 315																						
19																												
20																												
21																												
22																												
23																												
24																												
25																												
26																												
P 27						Terazzo - AAA - 3	rough blue & gray speckled terazzo flooring in Holding 3								80x15	20x15		72x15	80x5									
P 28						Brick - AAA - 2	9x9 red brick pavers & gray grout				60																	
P 29						Panel - AAA - 1	AAA mastic under NNN gray textured plastic wall panels																					
30						VAPOR-AAA	Tar and/or felt vapor barrier assembly							80x15	20x15		72x15	80x5										
31						FIREHOSES-AAA	Asbestos woven firehose																					
32						FIREDOORS-AAA	Asbestos core fire-rated door	1	9	12																			
33						Floors-NNN	W=Wood, C = Concrete, B = Brick, G = Glass, M = Metal, FG = Fiberglass, FB = Fiberboard				B	C	C	C	C	C	C	C								B		
34						Walls-NNN	W=Wood, C = Concrete, B = Brick, G = Glass, M = Metal, FG = Fiberglass, FB = Fiberboard				C	C	C	M	M	M	M	M										
35						Ceiling-NNN	W=Wood, C = Concrete, B = Brick, G = Glass, M = Metal, FG = Fiberglass, FB = Fiberboard					C	C	M	M	M	M											
36						Tubes	Mercury containing Fluorescent Tubes	14	24	16			2	46	4		20	20	2			22	240	4	216	4		6
37						Ballasts	PCB Containing Ballasts	7	12	8	6		1	8	2		10	10	1			11	20	2	8	2		3
38						Smoke Detectors	Lead Acid Batteries			2	3																	

✱ Hydraulic elevator equipment US Elevators

incl. padded cell & NO access

	A	B	C	D	E	F	G	AC	AD	AE	AF	AG	AH	AI	AJ	AK	AL	AM	AN	AO	AP	AQ	AR	AS
1	720 E San Ysidro - MAIN BUILDING, EXTERIOR & ROOFS							(MAIN - FIRST FLOOR)												MEZZANINE				
	1	2	3	4	5	Material ID	Material Description	OFFICE 9 ✓	OFFICE 10	PEDESTRN	RECEPT	STOR	TELE 1	TLT 3	TLT 3	VEST 1	VEST 2	WOMEN / MEN 1	WOMEN / MEN 2	ATTIC	CORR	ELEC	MECH	TELE
3	Known Asb					STSFP-300			TO ACCESS															
4						WLSH-301		60x15			260 x 15	100x15		340 + (4x8)	400 + 46	2x9x15	18x15	(75x10x2) + (20x15x2) x2	(11200)					
5						BBMAS-302				8x24	240					9x9								
6						FLVCT-303		200								9x9								
7						CLLI-304		200		(30x15) (40x15)	60x30						40							
8						STSFP-305		200		4500 + 4600	60x30	36x12		9x8	46		40	20x18 x2	23x10 x2					
9						FLCER-306								9x8	6x8			20x18x2	(230) x2					
10						WLCER-307								340	400 + 46				(1600) x2					
11						WLPL-308																		
12						BBMAS-309		80			20	100					28							
13						FLVCT-310																		
14						CLINS-311				4500 + 4600														
15						WLPL-312				15 x 520														
16						FLVCT-313					60x30	36x12				9x9	40							
17						BBMAS-314																		
18	✓	✓	✓			FLVCT-315	12 x 12 gray/green w/ light streaks & mastic														30x6	16x24		
19	✓	✓	✓			BBMAS-316	4" black vinyl base & mastic														66	76		
20																								
21																								
22																								
23																								
24																								
25																								
26																								
27																								
28						Brick-AAA-7				4500 + 4600														
29						Panel-AAA-1																		
30						VAPOR-AAA	Tar and/or felt vapor barrier assembly							9x8	6x8			2x20x18	23x10x2					
31						FIREHOSES-AAA	Asbestos woven firehose																	
32						FIREDOORS-AAA	Asbestos core fire-rated door			11	1					1	2							
33						Floors-NNN	W=Wood, C = Concrete, B = Brick, G = Glass, M = Metal, FG = Fiberglass, FB = Fiberboard			B			C							m	C	C	C	C
34						Walls-NNN	W=Wood, C = Concrete, B = Brick, G = Glass, M = Metal, FG = Fiberglass, FB = Fiberboard			C			c			e				C	C	C	c	c
35						Ceiling-NNN	W=Wood, C = Concrete, B = Brick, G = Glass, M = Metal, FG = Fiberglass, FB = Fiberboard			M			C							C	C	C	C	C
36						Tubes	Mercury containing Fluorescent Tubes	8		1000	34	6			2		2	16	8	4	12	16	16	4
37						Ballasts	PCB Containing Ballasts	4		500	17	3	1		1	1	1	8	4	2	6	8	8	2
38						Smoke Detectors	Lead Acid Batteries			5	2													

20 | 500 / 10,000

* Dry-type

Row	A B C D E (1 2 3 4 5)	F: Material ID	G: Material Description	AT: BREAK 1	AU: BREAK 2	AV: COMPUTER	AW: CORR	AX: CUST 1	AY: CUST 2	AZ: CUST 3	BA: HOLDING	BB: LOCKERS 1	BC: LOCKERS 2	BD: LOCKERS 3	BE: LOCKERS 4	BF: OFFICE 1	BG: OFFICE 2	BH: OFFICE 3	BI: OFFICE 4
																46 x 30	60 x 15	*NA	75X50
1	720 E San Ysidro - MAIN BUILDING, EXTERIOR & ROOFS			SECOND FLOOR					10X12	10 x 13		15x20	✓	30 x 15	20x15	✓	✓		✓
2				✓	40X20	15 x 25 ✓		✓	✓	✓	✓	✓	✓	✓	✓			*NA	
3	✓✓✓✓✓	FLVCT - 303		15x30	40x20	305	5800		100			15x20	(15x20) 2	30x15	20 x 15		1500		
4		CLL1 - 304	2x4	15 x 30	40x20	305	5800												75x50
5		BBMAS - 309	dark gray/grn	90	170	80	see drwg		20			70 (struck)	140	90	50	20	300		350
6	✓✓✓✓✓✓✓✓	WLSH - 317	Painted textured drywall + tape thoughout Second floor (Walls/ceilings)	90 x 15	170 x 15	80 x 15	see drwg		(+100) 40 x 15		54x6x15	70(15) +(15x20)	((70x15) + (15x20)) 2	450 + (90x15)	300 + (50x15)	(40 x 30) + (300)	1500 + 750		400 x 15
7		BBMAS-316	4" black													150			
8		BBMAS - 302	4" light gray													100			
9	✓✓✓✓✓✓✓✓	CLPL-318	rought textured hard-top ceiling plaster on pedestrian canopy	40 (struck)			40												
10	✓✓✓	WLCER-319	4"x6" white ceramic, ~~unglazed~~, wall tile (Pb glaze)																
11	15 ✓✓✓✓	STSFP-305		15 x 30	40x20	305	5800		100			300	300	450	300	1200	1500		
12	✓	FLVCT - 310					25% of total flr												
13	✓✓✓	BBMAS-320	4" off-white vinyl base + mastic																350
14	✓	BBMAS - 321	Patch of 4" tan vinyl base + mastic																
15	✓✓✓	CLPL - 322	tan, rough textured hard-top ceiling plaster over lathe - holding floor 2								15x12x6								
16																			
17																			
18																			
19																			
20																			
21																			
22																			
23																			
24																			
25																			
26																			
27		Brick-AAA-2																	
28		Paver-AAA-1					1200												
29		TERRAZZO-AAA4	Black terrazzo w/ black + white specks																
30		VAPOR-AAA	Tar and/or felt vapor barrier assembly																
31		FIREHOSES-AAA	Asbestos woven firehose																
32		FIREDOORS-AAA	Asbestos core fire-rated door			1	75				900								
33		Floors-NNN	W=Wood, C = Concrete, B = Brick, G = Glass, M = Metal, FG = Fiberglass, FB = Fiberboard				—	C			C					CP	CP		CP
34		Walls-NNN	W=Wood, C = Concrete, B = Brick, G = Glass, M = Metal, FG = Fiberglass, FB = Fiberboard				C	C			M					C	C		
35		Ceiling-NNN	W=Wood, C = Concrete, B = Brick, G = Glass, M = Metal, FG = Fiberglass, FB = Fiberboard					C											
36		Tubes	Mercury containing Fluorescent Tubes	18	18	6	500	4	2	2	30	4	4	4	4	88	60		100
37		Ballasts	PCB Containing Ballasts	9	9	3	250	2	1	1	10	2	2	2	2	44	30		50
38		Smoke Detectors	Lead Acid Batteries				15												

2
75
4
300

	A	B	C	D	E	F	G	BJ	BK	BL	BM	BN	BO	BP	BQ	BR	BS	BT	BU	BV	BW	BX
1	720 E San Ysidro - MAIN BUILDING, EXTERIOR & ROOFS							(SECOND FLOOR)				20 x 14		175 x 15	45 x 20	85 x 60	18 x 10	8 x 15	15 x 20	30 x 20		
	1	2	3	4	5	Material ID	Material Description	OFFICE 5	OFFICE 6	OFFICE 7	OFFICE 8	OFFICE 9	OFFICE 10	OFFICE 11	OFFICE 12	RECEPTION	TELE	TOILET	WOMEN/ MEN 1	WOMEN/ MEN 2	WOMEN/ MEN 3	WOMEN/ MEN 4
3						FLVCT-303	L gray	24x30				280	45 x 50	2625	45 x 20	85 x 60	180	8 x 8				
4						CLLI-304		24 x 45	24 x 55	75 x 15	3750	280	"	2625	45 x 20	85 x 60						
5						BBMAS-309	dark gray/grn	380	200 x 15	400	500		350	(14 x 15) + 350	150	(85 x 4) + 120	56	8 x 4				
6						WLSH-317		(24 x 15) + (24 x 15) + (180 x 15)	Y	800 x 15	500 x 15	88	350 x 15	560 x 15	(300 + 130) x 15	↑ x 15	180 + (60 x 15)	48 + (16 x 15)	(70 x 10 x 2) + (15 x 20 x 2)	1400 + (30 x 20)	Same ←	←
7						BBMAS-316	black					88 x 15										
8						BBMAS-302	light gray															
9						CLPL-318																
10						WLCER-319												28 x 10	(70 x 10) x 2	1400	Same ←	←
11						SISEP-305		24 x 60	24 x 55	75 x 55	3750	280	45 x 50	2625	45 x 20	85 x 60	180		600	30 x 20	Same ←	←
12						FLVCT-310	mid/lt gray	24 x 30			3750											
13	✓✓					BBMAS ~ 320			200	400				60								
14						BBMAS ✓ 321				60												
15																						
16																						
17																						
18																						
19																						
20																						
21																						
22																						
23																						
24																						
25																						
26																						
27						Brick-AAA-2												8 x 19				
28						Panel-AAA-1										80 x 4						
29						Terr.-AAA-4													(15 x 20) x 2	30 x 20	←	←
30						VAPOR-AAA	Tar and/or felt vapor barrier assembly											70		500	700	440
31						FIREHOSES-AAA	Asbestos woven firehose															
32						FIREDOORS-AAA	Asbestos core fire-rated door															
33						Floors-NNN	W=Wood, C = Concrete, B = Brick, G = Glass, M = Metal, FG = Fiberglass, FB = Fiberboard	cp	cp	cp	cp	cp	cp	cp	cp	cp	cp					
34						Walls-NNN	W=Wood, C = Concrete, B = Brick, G = Glass, M = Metal, FG = Fiberglass, FB = Fiberboard															
35						Ceiling-NNN	W=Wood, C = Concrete, B = Brick, G = Glass, M = Metal, FG = Fiberglass, FB = Fiberboard															
36						Tubes	Mercury containing Fluorescent Tubes	48	12	50	60	8	90	100	20	60	4	4	28	28	28	28
37						Ballasts	PCB Containing Ballasts	24	6	25	30	4	45	50	10	30	2	2	14	14	14	14
38						Smoke Detectors	Lead Acid Batteries															

3 75 / 6 / 450 | 7 55 / 6 / 330

800

	A	B	C	D	E	F	G	BY	BZ	CA	CB	CC	CD	CE	CF	CG	CH	CI	CJ	CK	CL	CM
1	720 E San Ysidro - MAIN BUILDING, EXTERIOR & ROOFS							ALL FLOORS				EXTERIOR										
	1	2	3	4	5	Material ID	**Material Description**	NE STAIR	NW STAIR	ELEV 1	ELEV 2	EXT	PEDES TRIAN	CANOPI ES	ROOFS	Penthouses 1 2 3 ~~[illegible]~~						
3						CLPl-318	~~[illegible]~~						See dwgs	See dwgs								
4						~~RROLL~~-AAA-5	rolled gray gravel roofing + assoc mastics															
5							on 720, incl. ~~roof~~ penthouses. + parapets								See dwgs							
6	✓	✓	✓			Permas - 323	gray/silver painted mastics at REROLL sheet								225							
7							seams & penetrations & ~~parapet~~.															
8																						
9	✓	✓	✓			Permar - 324	Gray/Silver mastics @ parapet wall								see dwg	$						
10																						
11	✓					DHWMUD - 325	canvas wrapped molded DHW ~~joints~~/elbows															
12							in un-abated main canopy soffit - associated w/NNN FG pipe lagging															
13																						
14																						
15																						
16																						
17																						
18																						
19																						
20																						
21																						
22																						
23																						
24																						
25																						
26																						
27						~~#~~																
28						Brick-AAA-2																
29						FLRS-AAA-3	Black w/raised circular treads VCT + mastic in elevators			40	40											
30						VAPOR-AAA	Tar and/or felt vapor barrier assembly															
31						FIREHOSES-AAA	Asbestos woven firehose															
32						FIREDOORS-AAA	Asbestos core fire-rated door															
33						Floors-NNN	W=Wood, C = Concrete, B = Brick, G = Glass, M = Metal, FG = Fiberglass, FB = Fiberboard	C	C				C			m/c						
34						Walls-NNN	W=Wood, C = Concrete, B = Brick, G = Glass, M = Metal, FG = Fiberglass, FB = Fiberboard	C	C	m	m		C			m						
35						Ceiling-NNN	W=Wood, C = Concrete, B = Brick, G = Glass, M = Metal, FG = Fiberglass, FB = Fiberboard	C	C	m	m	C	C			m						
36						Tubes	Mercury containing Fluorescent Tubes	\	\	2	2		600									
37						Ballasts	PCB Containing Ballasts			1	1		300									
38						Smoke Detectors	Lead Acid Batteries															

* pre-fab corrugated cnct walls, un-painted, no surfacing, no exp. joint found.

E Headhouse

★ No Access

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y		Z	
1	720 E San Ysidro - OUT BUILDINGS							EAST HEADHOUSE			50x7	30x7	21x15	★	12x40	30x30	45x30	30x30	25x40	45x9	30x25		15x7			50x6		
2	1	2	3	4	5	Material ID	**Material Description**	10x12 ✓ COMPTR	120x7 ✓ CORR	10x10 ✓ ELEC	HOLD 1 ✓	HOLD 2 ✓	✓ LAB	✓ MECH	MEN/ WOMEN ✓	OFFICE 1 ✓	OFFICE 2 ✓	OFFICE 3 ✓	Waiting ✓	✓ RECEPT	✓ BREAK	★ TELE 2	✓ TOILET	See 720 STAIR	✓ EXT	CORR 2 ✓	ROOF	★ ✓ TELE 1
3	—					WLSH-600	Dry wall & tape walls & some (ceilings)	22x15	(240x15) +105				75x15		(180x15) +480	120x15	150x15	120x15	130x15	70x15	90x15		+105 (44x15)	Main				
4	—					FLVCT-601	12x12 " gray w/ beige streaks VCT & mastic	120	120x7				21x15				45x30	30x30	25x40	45x9							See Roofs on 720 Main + Dwgs	
5	—					BBMAS-602	4" light gray vinyl base & mastic		250 LF								10	30										
6	—					BBMAS-603	4" Dark gray/green vinyl bas & mastic	44					75				150	120	170	110								
7	—					CLL1-604	2x4 lay in ceiling tile w/ stripples & fissures	120	120x7				21x15			30x30	45x30	30x30	25x40	45x9	30x25							
8	✓	✓	✓	✓	✓✓	STSFP-605	Gray STSFP on ~~beams~~ & Decking	120	120x7	10x10			21x15		12x40	30x30	45x30	30x30	25x40	45x9	30x25		15x7					
9	✓	✓	✓			FLCER-606	2"x2" tan floor ceramic tile & grout								12x40								15x7			50x6		
10	✓	✓	✓			WLCER-607	4"x4" glazed off-white ceramic tile and grout and glue								180x10								44x10					
11	✓	✓	✓			CLPL-608	rough texture hard-top plaster on exterior portico undersides																		1000			
12	✓	✓	✓			FLVCT-609	12"x12" beige floor vinyl tiles with tan + grey speckles 2									30x30					30x25							
13	✓	✓	✓			BBMAS-610	4" black base w/ yellow+black mastic									120					90					112x15		
14	✓	✓	✓			WLPL-611	smooth plaster finishing coat over rough sandy plaster in corr2																					
15																												
16																												
17																												
8																												
19																												
20																												
21																												
22																												
23																												
24																												
25																												
26						TERRAZZO-AAA-9	Black w/ black + white flecks				50x7	30x7														50x6		
27						PANEL-AAA-8	4' NNN white paneling with AAA mastic														90x4							
28						VAPOR-AAA	Tar and/or felt vapor barrier assembly								12x40								15x7					
29						FIREHOSES-AAA	Asbestos woven firehose																					
30						FIREDOORS-AAA	Asbestos core fire-rated door		15																			
31						Floors-NNN	W=Wood, C = Concrete, B = Brick, G = Glass, M = Metal, FG = Fiberglass, FB = Fiberboard			C														C	C			
32						Walls-NNN	W=Wood, C = Concrete, B = Brick, G = Glass, M = Metal, FG = Fiberglass, FB = Fiberboard	C		C	C	M												C	C			
33						Ceiling-NNN	W=Wood, C = Concrete, B = Brick, G = Glass, M = Metal, FG = Fiberglass, FB = Fiberboard			C	M	M												C		M		
34						Tubes	Mercury containing Fluorescent Tubes	2	30	2	20	8	10		16		30	22	20	10				8		8		
35						Ballasts	PCB Containing Ballasts	1	15	1	10	4	5		8		15	11	10	5				4		4		
36						Smoke Detectors	Lead Acid Batteries																					

	A	B	C	D	E	F	G	AA	AB	AC	AD	AE	AF	AG	AH	AI	AJ	AK	AL	AM	AN	AO	AP	
													10 x 18	10x25	42x30									
1	720 E San Ysidro - OUT BUILDINGS							WEST HEADHOSUE - FIRST FLOOR				30x45				50x40	10x18	28x24						
								30x18	10x18	102x6	✓		office						*NA					Mech 2 (First fl)
2	1	2	3	4	5	Material ID	**Material Description**	BREAK	COMPTR	CORR	CUST	HOLD	4	MEN/ WOMEN	OFFICE 1	OFFICE 2	OFFICE 3	RECEPT	VAULT	MEZZ (MECH)	STAIR	EXT	ROOF	
3	✓	✓	✓			CLPL-510	hard top ceiling plaster under roof canopy	30x18														400		
4	✓	✓	✓	✓	✓	STSFP-500	On beams & Decking throughout	96	180	600	36	30x45	180	300	42x30	30x40	180	28 x 24		20x60				
5	✓	✓				BBWAS-501	4" brown vinyl base over 2" brown vinyl base & mastic			800	24		80				80	110		160				
6	✓	✓	✓			WLSH-502	Untextured, painted drywall & tape on one wall of MEZZ floor.													180 Ø				
7	✓	✓	✓			BBMAS-503	4" dark brown base w/ mastic		36			90			210	330		110						
8	✓	✓	✓			WLSH-504	off-white drywall & tape mud throughout, untextured	96x15	80 x 15	240x15	36 + (24x15)	90x15	80x15	1300	210x15	330x15	80x15	110x15						
9	✓	✓	✓			CLLI-505	4'x2' white laid in ct w/ (stipples + fissures	30x18	60	600			180			30x40	180							
10	✓	✓	✓			WLCER-506	4x4 off white glazed ceramic tile & grout							1000										
11	✓	✓	✓			FLCER-507	1x1 alt. light/med/dk brown cer floor tile & grout							300										
12	✓	✓	✓			BBMAS-508	4" lt gray vinyl base & mastic			180														
13	✓	✓	✓			FLUCT-509	12 x 12 beige w/ tan + gray streaks UCT & Mastic & black vinyl underlayer (?)	30x18					100		30x34		180							
14																								
15																								
16																								
17																								
18																								
19																								
20																								
21																								
22																								
23																								
24																								
25																								
26						Panel-AAA-7	4" off-white NNN plastic wallboard & associated AAA mastic	80		240 Ø														
27						BRICK-AAA-6				600	36	45x6	80		30x8	30x40								
28						VAPOR-AAA	Tar and/or felt vapor barrier assembly					30x45		300										
29						FIREHOSES-AAA	Asbestos woven firehose																	
30						FIREDOORS-AAA	Asbestos core fire-rated door																	
31						Floors-NNN	W=Wood, C = Concrete, B = Brick, G = Glass, M = Metal, FG = Fiberglass, FB = Fiberboard		C/CP		C	C								C	C			C
32						Walls-NNN	W=Wood, C = Concrete, B = Brick, G = Glass, M = Metal, FG = Fiberglass, FB = Fiberboard		C		C	C								C	C			C
33						Ceiling-NNN	W=Wood, C = Concrete, B = Brick, G = Glass, M = Metal, FG = Fiberglass, FB = Fiberboard		M		C	C								C/M	C			C
34						Tubes	Mercury containing Fluorescent Tubes	10	8	40	2	40	4	8		16	16	20		8	2			
35						Ballasts	PCB Containing Ballasts	5	4	20	1	20	2	4		8	8	10		4	1			
36						Smoke Detectors	Lead Acid Batteries																	

* Control booths 1-24: 1 ballast & 2 tubes ea m/C walls, W floors, C ceilings | Control Booth Metal & CMU 2 ballasts

	A	B	C	D	E	F	G	AQ	AR	AS	AT	AU	AV	AW	AX	AY	AZ	BA	BB	BC
1	720 E San Ysidro - OUT BUILDINGS							SECONDARY INSPECTION EAST					SECONDARY INSPECTION WEST					E MECH		
2	1	2	3	4	5	Material ID	Material Description	70x20 OFFICE	7x8 TOILET 1	6x6 TOILET 2	EXT	see 720 ROOF	20x10 HOLD	5x5 TOILET	25x15 OFFICE	EXT	see 720 ROOF	FIRST FLOOR	MEZZ	STAIR
3	✓	✓	✓			WLSH-200	Unfeatured drywall + tape partitions at E Mech. First floor										Main	75x15		
4	✓	✓				BBMAS-201	4" light gray vinyl base + mastic in E mech Room											75		
5	✓	✓	✓	✓		Filter-202	gray cotton-like filter on 1st flor E Mech ~~ceiling~~ Wall Vents											15x15	15x15	
6	✓	✓	✓			WLPL-203	Smooth painted plaster on Lath on E Mech Second floor walls												1200	[illegible]
P 7	✓	✓	✓			STUCCO-700	exterior stucco on N. soffit				8x30					8x30				
P 8	✓	✓	✓			WLSH-701	White painted sheetrock with tape + mud	250x12	(30x12) +(7x8)	(+36) (36x12)				(25+) (25x10)						
P 9	✓	✓	✓			FLVCT-702	12" x 12" blue vinyl floor tile with white + grey specks + mastic	45x20	7x8											
P 10	✓	✓	✓			BBMAS-703	4" navy blue base w/ mastic	250	30											
P 11	✓	✓	✓			CLL1-704	2' x 2' lay-in white ceiling tile w/ fissures + spittles.	70x20							25x10					
12																				
13																				
14																				
15																				
16																				
17																				
18																				
19																				
20																				
21																				
22																				
23																				
24																				
25																				
P 26						TERRAZZO_AAA-11	blue terrazzo flooring in men's toilet (2)			6x6			20x10	5x5	25x15					
P 27						PANEL-AAA-10	6' paneling (white) NNN with AAA mastic	75x12						25x10	400					
28						VAPOR-AAA	Tar and/or felt vapor barrier assembly		7x8	6x6										
29						FIREHOSES-AAA	Asbestos woven firehose													
30						FIREDOORS-AAA	Asbestos core fire-rated door													
31						Floors-NNN	W=Wood, C = Concrete, B = Brick, G = Glass, M = Metal, FG = Fiberglass, FB = Fiberboard											C	C	C
32						Walls-NNN	W=Wood, C = Concrete, B = Brick, G = Glass, M = Metal, FG = Fiberglass, FB = Fiberboard						M			C		C	C	C
33						Ceiling-NNN	W=Wood, C = Concrete, B = Brick, G = Glass, M = Metal, FG = Fiberglass, FB = Fiberboard						M					C	C	C
4						Tubes	Mercury containing Fluorescent Tubes						4	2	8			12	30	8
35						Ballasts	PCB Containing Ballasts						2	1	4			6	25	4
36						Smoke Detectors	Lead Acid Batteries													

	A	B	C	D	E	F	G	BD	BE	BF	BG	BH	BI	BJ	BK	BL	BM	BN	BO	BP	BQ	BR	BS
1	720 E San Ysidro - OUT BUILDINGS							W MECH				CONTROL BOOTH		EXIT CONTROL		PERMIT OFFICE					BIRD QUARANTINE		
2	1	2	3	4	5	Material ID	Material Description EXT	FIRST FLOOR	MEZZ	SECOND FLOOR	STAIR	BOOTH	EXT	BOOTH	EXT	25x20 OFFICE ✓	4x5 TOILET ✓	TOILE	EXT	See 720 ROOF	12x15 STORAGE	EXT	See 720 ROOF
3	✓	✓	✓			FIBER-480	Tan & green Exhaust air filters on 2nd floor @ W Mech			60 ø										Main			Main
4	—					~~CDRL-~~	Main canopy hard-top CLPL 100%						✓										
P 5	✓	✓	✓			STUCCO-800	see 2nd Inspection East												1000				
P 6	✓	✓	✓			FLVCT-801	12" x 12" vinyl floor tile, light blue with white + grey specs + mastic									25x20	4x5						
P 7	✓	✓	✓			BBMAS-802	4" dark grey/green base w/mastic									90	18						
P 8	✓	✓	✓			WLSH-803	beige painted untextured drywall w/ tape									90x15	20+ (18 x15)						
P 9	✓	✓	✓			CLLI-804	2'x4' lay in ceiling tile w/ fissures + pinholes							10x9		25x20							
10																							
11																							
12																							
13																							
14																							
15																							
16																							
17																							
18																							
19																							
20																							
21																							
22																							
23																							
24																							
25																							
26						Terrazzo-AAA-11	See other description (2nd inspect)														12x15		
27						PANEL-AAA-12	See 2nd inspect. panel-AAA-10.										18x15						
28						VAPOR-AAA	Tar and/or felt vapor barrier assembly																
29						FIREHOSES-AAA	Asbestos woven firehose																
30						FIREDOORS-AAA	Asbestos core fire-rated door																
31						Floors-NNN	W=Wood, C = Concrete, B = Brick, G = Glass, M = Metal, FG = Fiberglass, FB = Fiberboard	C	C	C	C	M		M	C						M	M	
32						Walls-NNN	W=Wood, C = Concrete, B = Brick, G = Glass, M = Metal, FG = Fiberglass, FB = Fiberboard	C C/M	C/M	C/M	C	M		M	C/M				C		M	M	
33						Ceiling-NNN	W=Wood, C = Concrete, B = Brick, G = Glass, M = Metal, FG = Fiberglass, FB = Fiberboard	C	C	C	C	CP			C						M	M	
34						Tubes	Mercury containing Fluorescent Tubes	32	ø	ø		4		4							4		
35						Ballasts	PCB Containing Ballasts	8	ø	ø		2		2							2		
36						Smoke Detectors	Lead Acid Batteries																

Attachment 3

Materials Matrix Report &
Abatement Cost Estimate

720 E. San Ysidro					MAIN - FIRST FLOOR																														MEZZANINE				
HA	Material ID	Material Description	Asb? Yes, No, Trace	Units	BREAK	CORR 1	CORR 2	CUST	ELEC 1	ELEC 2	HOLD 1	HOLD 2	HOLD 3	HOLD4	LOCKER 1	LOCKER 2	OFFICE 2	OFFICE 3	OFFICE 4	OFFICE 5	OFFICE 6	OFFICE 7	OFFICE 8	OFFICE 9	OFFICE 10	PEDESTRN	RECEPT	STOR	TELE 1	TLT 1	TLT 3	VEST 1	VEST 2	WOMEN / MEN 1	WOMEN / MEN 2	ATTIC	CORR	ELEC	MECH	TELE
ASBESTOS-CONTAINING MATERIALS																																							
300	**STSFP-300**	**Un-abated ACM structural fireproofing (1987 bulk sample ID's 130079 - 130083) in the main canopy soffit**	**YES**	**SF**																																			
315	**FLVCT-315**	**12" x 12" Grey/green vinyl composite floor tile with lighter streaks and associated mastics**	**Yes**	**SF**																																**180**			**384**
ASSUMED ASBESTOS-CONTAINING MATERIALS																																							
AAA01	**PANEL-AAA1**	**Assumed asbestos mastics under non-suspect textured gray/off-white plastic wall panels**	**AAA**	**SF**																																			
AAA02	**BRICK-AAA2**	**9" x 9" Red brick pavers with associated gray grout and mortar**	**AAA**	**SF**				**60**																	**9100**													
AAA03	**FLVCT-AAA3**	**Black vinyl composite sheeting with raised circular treads and associated mastics in elevators**	**AAA**	**SF**																																			
AAA04	**TERRAZZO-AAA4**	**Black terrazzo with black and white specks**	**AAA**	**SF**																																			
AAA05	**RFROLL-AAA5**	**Rolled gray gravel roofing, associated mastics, and lightweight concrete on all roofs**	**AAA**	**SF**																																			
AAA06	**VAPOR-AAA6**	**Tar and/or felt vapor barrier assembly in restrooms**	**AAA**	**SF**							**1200**	**300**	**1080**	**400**																**72**	**48**			**720**	**460**					
AAA07	**FIREDOORS-AAA7**	**Asbestos core fire-rated door**	**AAA**	**EA**	**1**	**9**	**12**												**1**							**11**	**1**					**1**	**2**							
AAA08	**TERRAZZO-AAA8**	**Rough, blue and gray speckled terrazzo flooring**	**AAA**	**SF**							**1200**	**300**	**1080**	**400**																									
NON-ASBESTOS CONTAINING MATERIALS																																							
301	WLSH-301	Textured and painted drywall and tape throughout Main Bldg First Floor and some ceilings	No	SF	1500	5250	2300							1800	420		3000	4200	660	450	660	3150	560	900			3900	1500		412	446	270	420	2200	2240					
302	BBMAS-302	4" Light gray vinyl baseboard and associated mastics	No	LF		350	250	40										200				150	44			192	240				81								
303	FLVCT-303	12" x 12" Light gray vinyl composite floor tile with beige and gray streaks and associated mastics and leveling compounds	No	SF	525		600								49						121	700	120	200								81							
304	CLLI-304	2' x 4' Laid-in white ceiling tile with fissures and stipples	No	SF	525	960	600	60							49		675	2400	120	320	121	700		200		1200	1800						40							
305	STSFP-305	Newer, gray structural fireproofing on beams and ducting throughout main office building	No	SF	525	960	600	60			1200	300	1080	400	49		675	2400	120	320	121	700	120	200		9100	1800	432		72	46		40	720	460					
306	FLCER-306	2" x 2" Grey ceramic floor tile and associated grout and mortar	No	SF																										72	48			720	460					
307	WLCER-307	4" x 4" Glazed, white and blue ceramic wall tile with associated grout and mortar	No	SF																										340	400				1320					
308	WLPL-308	Hard-top, textured ceiling plaster on lath in holding cells	No	SF										400	28																									
309	BBMAS-309	4" Dark gray/green vinyl baseboard and associated mastic	No	LF	100												200	300	44		44	60		80			20	100					28							
310	FLVCT-310	12" x 12" Grey vinyl composite floor tile with beige and gray streaks and associated mastics	No	SF																		90																		
311	CLINS-311	Grey, felt insulation above aluminum ceiling slats (accessible only in an area with a broken slat)	No	SF																						9100														
312	WLPL-312	Textured wall plaster with skim coat and rough, sandy plaster layer on lath and concrete	No	SF				800												450						7800														
313	FLVCT-313	12" x 12" alternating light and dark gray/green vinyl composite floor tile and associated mastics	No	SF		960											675	2400	120								1800	432				81	40							
314	BBMAS-314	4" Red/brown vinyl baseboard and associated mastics	No	LF				10												60																				
316	BBMAS-316	4" Black vinyl baseboard and associate mastic	No	LF																																66			76	
317	WLSH-317	Painted and textured drywall with tape and mud throughout Second Floor, including walls and ceilings	No	SF																																				
318	CLPL-318	Rough textured, hard-top ceiling plaster on pedestrian canopy; the top side of this material is considered contaminated by debris from HA 300.	No	SF																																				
319	WLCER-319	4" x 6" White, glazed ceramic wall tile with associated grout and mortar	No	SF																														PNQ	PNQ						
320	BBMAS-320	4" Off-white vinyl baseboard and associated mastics	No	LF																																				
321	BBMAS-321	4" Tan vinyl baseboard patch and associated mastics	No	LF																																				
322	CLPL-322	Tan, rough textured, hard-top ceiling plaster over lath in holding cells on Second Floor	No	SF																																				
323	PENMAS-323	Grey/silver painted mastics at assumed asbestos rolled roofing (RFROLL-AAA5) seams and penetrations	No	SF																																				
324	PARMAS-324	Grey/silver painted mastics at parapet walls	No	SF																																				
325	DHWMUD-325	Canvas wrapped mudded DHW joints/elbows in unabated Main Bldg canopy soffit with associated NNN fiberglass pipe lagging	No	EA																																				
NON-SUSPECT MATERIALS																																							
	Ceiling-NNN	W=Wood, C = Concrete, B = Brick, G = Glass, M = Metal, FG = Fiberglass, FB = Fiberboard, CP = Carpet	NNN						C	C	M	M	M													M			C							C	C	C	C	C
	DUCT-NNN	Non-suspect duct insulation; FG= Fiberglass	NNN		FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG		FG	FG		FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG
	Floors-NNN	W=Wood, C = Concrete, B = Brick, G = Glass, M = Metal, FG = Fiberglass, FB = Fiberboard, CP = Carpet	NNN					B	C	C	C	C	C	C							B					B			C							M	C	C	C	C
	PI-NNN	Non-suspect pipe insulation; FG=Fiberglass	NNN		FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG		FG	FG		FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG
	Walls-NNN	W=Wood, C = Concrete, B = Brick, G = Glass, M = Metal, FG = Fiberglass, FB = Fiberboard, CP = Carpet	NNN					C	C	C	M	M	M	M												C			C			C				C	C	C	C	C
OTHER MATERIALS																																							
	Tubes	Mercury containing Fluorescent Tubes	NNN		14	24	16	6		2	16	4	20	20	2		22	40	4	16	4		6	8		1000	34	6	2		2	2	2	16	8	4	12	4	16	16
	Ballasts	PCB Containing Ballasts	NNN		7	12	8	3		1	8	2	10	10	1		11	20	2	8	2		3	4		500	17	3	1		1	1	1	8	4	2	6	2	8	8
	Smoke Detectors	Lead Acid Batteries	NNN				2																			5	2													

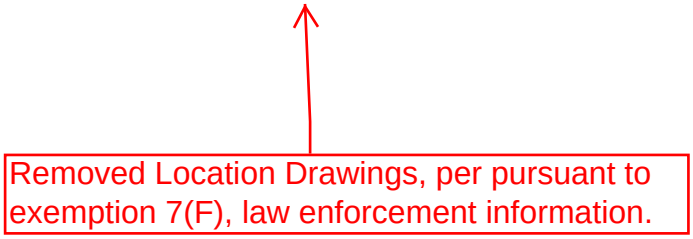
Ysidro		SECOND FLOOR																																ALL FLOORS				EXTERIOR						
Material ID	**Material Description**	BREAK 1	BREAK 2	COMPUTER	CORR	CUST 1	CUST 2	CUST 3	HOLDING	LOCKERS 1	LOCKERS 2	LOCKERS 3	LOCKERS 4	OFFICE 1	OFFICE 2	OFFICE 3~	OFFICE 4	OFFICE 5	OFFICE 6	OFFICE 7	OFFICE 8	OFFICE 9	OFFICE 10	OFFICE 11	OFFICE 12	RECEPTION	TELE	TOILET	WOMEN/ MEN 1	WOMEN/ MEN 2	WOMEN/ MEN 3	WOMEN/ MEN 4	NE STAIR	NW STAIR	ELEV 1	ELEV 2	EXT	PEDESTRIAN	CANOPY	ROOFS	**TOTALS**	**$ PER UNIT**	**$ SUBTOTAL**
S-CONTAINING MATERIALS																																											
STSFP-300	**Un-abated ACM structural fireproofing (1987 bulk sample ID's 130079 - 130083) in the main canopy soffit**																																						32000		32000	**$30**	**$1,200,000**
FLVCT-315	**12" x 12" Grey/green vinyl composite floor tile with lighter streaks and associated mastics**																																								564	**$5**	**$3,525**
O ASBESTOS-CONTAINING MATERIALS																																											
PANEL-AAA1	**Assumed asbestos mastics under non-suspect textured gray/off-white plastic wall panels**				1200																					320															1520	**$5**	**$9,500**
BRICK-AAA2	**9" x 9" Red brick pavers with associated gray grout and mortar**																											48													9208	**$5**	**$57,550**
FLVCT-AAA3	**Black vinyl composite sheeting with raised circular treads and associated mastics in elevators**																																		40	40					80	**$5**	**$500**
TERRAZZO-AAA4	**Black terrazzo with black and white specks**																												600	600	600	600									2400	**$20**	**$60,000**
RFROLL-AAA5	**Rolled gray gravel roofing, associated mastics, and lightweight concrete on all roofs**																																							71600	71600	**$20**	**$1,790,000**
VAPOR-AAA6	**Tar and/or felt vapor barrier assembly in restrooms**								900																			70		500	700	440									6890	**$20**	**$172,250**
FIREDOORS-AAA7	**Asbestos core fire-rated door**			1	75																																				114	**$100**	**$14,250**
TERRAZZO-AAA8	**Rough, blue and gray speckled terrazzo flooring**																																								2980	**$20**	**$74,500**
ESTOS CONTAINING MATERIALS																																											
WLSH-301	Textured and painted drywall and tape throughout Main Bldg First Floor and some ceilings																																										
BBMAS-302	4" Light gray vinyl baseboard and associated mastics													100																													
FLVCT-303	12" x 12" Light gray vinyl composite floor tile with beige and gray streaks and associated mastics and leveling compounds	450	800	305	5800		100			300	600	450	300		1500			720				280	2250	2625	900	5100	180	64															
CLLI-304	2' x 4' Laid-in white ceiling tile with fissures and stipples	450	800	305	5800												3750	1080	1320	1125	3750	280	2250	2625	900	5100																	
STSFP-305	Newer, gray structural fireproofing on beams and ducting throughout main office building	450	800	305	5800		100			300	600	450	300	1200	1500			1440			3750	280	2250	2625	900	5100	180		600	600	600	600											
FLCER-306	2" x 2" Grey ceramic floor tile and associated grout and mortar																																										
WLCER-307	4" x 4" Glazed, white and blue ceramic wall tile with associated grout and mortar																																										
WLPL-308	Hard-top, textured ceiling plaster on lath in holding cells																																										
BBMAS-309	4" Dark gray/green vinyl baseboard and associated mastic	90	120	80	ee drawing		20			70	140	90	50	20	300		350	380		400	500		350	560	150	460	56	32															
FLVCT-310	12" x 12" Grey vinyl composite floor tile with beige and gray streaks and associated mastics			25% of total floor														720	1320	1125	3750																					
CLINS-311	Grey, felt insulation above aluminum ceiling slats (accessible only in an area with a broken slat)																																										
WLPL-312	Textured wall plaster with skim coat and rough, sandy plaster layer on lath and concrete																																										
FLVCT-313	12" x 12" alternating light and dark gray/green vinyl composite floor tile and associated mastics																																										
BBMAS-314	4" Red/brown vinyl baseboard and associated mastics																																										
BBMAS-316	4" Black vinyl baseboard and associate mastic													150								88																					
WLSH-317	Painted and textured drywall with tape and mud throughout Second Floor, including walls and ceilings	1350	1800	1200	ee drawing		700		4860	1350	2700	1800	1050	1500	2250		6000	6660	3000	12000	7500	1320	5250	8400	2250	6900	1080	738	2000	2000	2000	2000											
CLPL-318	Rough textured, hard-top ceiling plaster on pedestrian canopy; the top side of this material is considered contaminated by debris from HA 300.				40																																	PNQ	PNQ				
WLCER-319	4" x 6" White, glazed ceramic wall tile with associated grout and mortar																											280	1400	1400	1400	1400											
BBMAS-320	4" Off-white vinyl baseboard and associated mastics																350		200	400				60																		
BBMAS-321	4" Tan vinyl baseboard patch and associated mastics																			60																						
CLPL-322	Tan, rough textured, hard-top ceiling plaster over lath in holding cells on Second Floor								1080																																	
PENMAS-323	Grey/silver painted mastics at assumed asbestos rolled roofing (RFROLL-AAA5) seams and penetrations																																							225			
PARMAS-324	Grey/silver painted mastics at parapet walls																																										
DHWMUD-325	Canvas wrapped mudded DHW joints/elbows in unabated Main Bldg canopy soffit with associated NNN fiberglass pipe lagging																																										
PECT MATERIALS																																											
Ceiling-NNN	W=Wood, C = Concrete, B = Brick, G = Glass, M = Metal, FG = Fiberglass, FB = Fiberboard, CP = Carpet					C																											C	C	M	M	C	C	C/M				
DUCT-NNN	Non-suspect duct insulation; FG= Fiberglass	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG											
Floors-NNN	W=Wood, C = Concrete, B = Brick, G = Glass, M = Metal, FG = Fiberglass, FB = Fiberboard, CP = Carpet					C			C					CP	CP		CP	CP	CP	CP	CP	CP	CP	CP	CP	CP	CP						C	C				C				
PI-NNN	Non-suspect pipe insulation; FG=Fiberglass	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG											
Walls-NNN	W=Wood, C = Concrete, B = Brick, G = Glass, M = Metal, FG = Fiberglass, FB = Fiberboard, CP = Carpet				C	C			M					C	C																		C	C	M	M		C				
ATERIALS																																											
Tubes	Mercury containing Fluorescent Tubes	18	18	6	500	4	2	2	36	4	4	4	4	88	60		100	48	12	50	60	8	90	100	20	60	4	4	28	28	28	28			2	2		600					
Ballasts	PCB Containing Ballasts	9	9	3	250	2	1	1	18	2	2	2	2	44	30		50	24	6	25	30	4	45	50	10	30	2	2	14	14	14	14			1	1		300					
Smoke Detectors	Lead Acid Batteries				15																																							

	720 E San Ysidro - OUT BUILDINGS				EAST HEADHOUSE																		WEST HEADHOUSE														
HA	Material ID	Material Description	Asb? Yes, No, Trace	Units	COMPTR	CORR	CORR 2	ELEC	HOLD 1	HOLD 2	LAB	MECH*	MEN/ WOMEN	OFFICE 1	OFFICE 2	OFFICE 3	WAITING	RECEPT	BREAK	TELE 1	TELE 2	TOILET	BREAK	COMPTR	CORR	CUST	HOLD	MEN/ WOMEN	OFFICE 1	OFFICE 2	OFFICE 3	OFFICE 4	RECEPT	MECH 2	VAULT*	MEZZ (MECH)	STAIR
ASBESTOS-CONTAINING MATERIALS																																					
611	**WLPL-611**	**Smooth plaster finishing coat over rough, sandy plaster in Corr 2 of East Headhouse**	**Yes**	**SF**			**1680**																														
ASSUMED ASBESTOS CONTAINING MATERIALS																																					
AAA04	**TERRAZZO-AAA4**	**Black terrazzo with black and white specks**	**AAA**	**SF**			**300**		**350**	**210**																											
AAA06	**VAPOR-AAA6**	**Tar and/or felt vapor barrier assembly in restrooms**	**AAA**	**SF**									**480**									**105**					**1350**	**300**									
AAA07	**FIREDOORS-AAA7**	**Asbestos core fire-rated door**	**AAA**	**EA**		**15**																															
AAA09	**BRICK-AAA9**	**6" x 6" Red brick ceramic pavers with associated grout and mortar**	**AAA**	**SF**																					**600**	**36**	**270**		**240**	**1200**		**80**					
AAA10	**PANEL-AAA10**	**4' Off-white non-suspect plastic wallboard with associated assumed mastics**	**AAA**	**SF**																			**80**		**240**												
AAA11	**PANEL-AAA11**	**4' White non-suspect plastic wallboard with associated assumed mastics**	**AAA**	**SF**															**360**																		
AAA12	**PANEL-AAA12**	**10' White non-suspect plastic paneling with associated assumed asbestos mastics**	**AAA**	**SF**																																	
AAA13	**TERRAZZO-AAA13**	**Blue terrazzo flooring in Secondary Inspection East & West**	**AAA**	**SF**																																	
NON-ASBESTOS CONTAINING MATERIALS																																					
200	WLSH-200	Untextured drywall and tape partitions on East Mech First Floor	No	SF																																	
201	BBMAS-201	4" Light gray vinyl baseboard and associated mastics in East Mech	No	LF																																	
202	FILTER-202	Grey, cotton-like filter on First Floor of E. Mechanical wall vents	No	SF																																	
203	WLPL-203	Smooth, painted plaster on lath on E. Mechanical Second Floor walls	No	SF																																	
400	FILTER-400	Tan and green exhaust air filters on Second Floor of West Mech	No	SF																																	
500	STSFP-500	Structural fireproofing on beams and decking throughout West Headhouse	No	SF																			96	180	600	36	1350	300	1260	1200	180	180	672			1200	
501	BBMAS-501	4" Brown vinyl baseboard over 2" brown vinyl baseboard and associated mastics	No	LF																					60	24					80	80	110			160	
502	WLSH-502	Untextured, painted drywall and tape on Mezzanine of West Headhouse	No	SF																																180	
503	BBMAS-503	4" Dark brown vinyl baseboard and associated mastic	No	LF																				36			90		210	330			110				
504	WLSH-504	Off-white, untextured drywall and tape throughout West Headhouse	No	SF																			1440	1200	3600	396	1350	1300	3150	4950	1200	1200	1650				
505	CLLI-505	4' x 2' White, laid-in ceiling tile with stipples and fissures	No	SF																			540	60	600					1200	180	180					
506	WLCER-506	4" x 4" Off-white, glazed ceramic wall tile and associated grout and mortar in the West Headhouse	No	SF																								1000									
507	FLCER-507	1" x 1" Alternating light, medium, and dark brown ceramic floor tile and associated grout and mortar	No	SF																								300									
508	BBMAS-508	4" Light gray vinyl baseboard and associated mastics in West Headhouse	No	LF																					180												
509	FLVCT-509	12" x 12" Beige vinyl composite floor tile with tan and gray streaks with associated mastics and possible black vinyl layer underneath	No	SF																			540						1020		180	100					
510	CLPL-510	Hard-top ceiling plaster under roof canopy	No	SF																			540														
600	WLSH-600	Drywall with tape on walls and some ceilings in East Headhouse	No	SF	330	3705					1125		3180	1800	2250	1800	1950	1050	1350			765															
601	FLVCT-601	12" x 12" Light gray vinyl composite floor tile with beige streaks and associated mastics	No	SF	120	840					315				1350	900	1000	405																			
602	BBMAS-602	4" Light gray vinyl baseboard and associated mastics in East Headhouse	No	LF		250									10	30																					
603	BBMAS-603	4" Dark gray/green vinyl baseboard and associated mastics in East Headhouse	No	LF	44						75				150	120	170	110																			
604	CLLI-604	4' x 2' Laid-in ceiling tile with stipples and fissures	No	SF	120	840					315			900	1350	900	1000	405	750																		
605	STSFP-605	Grey structural fireproofing on beams and decking throughout East Headhouse	No	SF	120	840		100			315		480	900	1350	900	1000	405	750			105															
606	FLCER-606	2" x 2" Tan ceramic floor tile and associated grout and mortar	No	SF			300						480									105															
607	WLCER-607	4" x 4" Off-white, glazed ceramic wall tile and associated grout and mortar in the East Headhouse	No	SF									1800									440															
608	CLPL-608	Rough-textured, hard-top plaster on exterior portico and undersides	No	SF																																	
609	FLVCT-609	12" x 12" Beige vinyl composite floor tile with tan and grey specks and associated yellow and black mastics	No	SF										900					750																		
610	BBMAS-610	4" Black vinyl baseboard with associated mastics	No	LF										120					90																		
700	STUCCO-700	Exterior stucco on soffits	No	SF																																	
701	WLSH-701	White painted drywall with tape and mud	No	SF																																	
702	FLVCT-702	12" x 12" Blue vinyl composite floor tile with white and gray specks and associated mastics	No	SF																																	
703	BBMAS-703	4" Navy blue vinyl baseboard with associated mastics	No	LF																																	
704	CLLI-704	2' x 2' White, laid-in ceiling tile with fissures and stipples	No	SF																																	
800	STUCCO-800	Exterior stucco on Soffits	No	SF																																	
801	FLVCT-801	12" x 12" Light blue vinyl composite floor tile with white and gray specks and associated mastics	No	SF																																	
802	BBMAS-802	4" Dark gray/green vinyl baseboard and associated mastics in Permit Office	No	LF																																	
803	WLSH-803	Beige painted, untextured drywall with tape and mud in Permit Office	No	SF																																	
804	CLLI-804	4' x 2' Laid-in ceiling tile with stipples and fissures in Exit Control and Permit Office	No	SF																																	
NON-SUSPECT MATERIALS																																					
	Ceiling-NNN	W=Wood, C = Concrete, B = Brick, G = Glass, M = Metal, FG = Fiberglass, FB = Fiberboard	NNN				M	C	M	M														M		C	C						C		C/M	C
	DUCT-NNN	Non-suspect duct insulation; FG= Fiberglass	NNN		FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG
	Floors-NNN	W=Wood, C = Concrete, B = Brick, G = Glass, M = Metal, FG = Fiberglass, FB = Fiberboard	NNN					C																C/CP		C	C						C		C	C
	PI-NNN	Non-suspect pipe insulation; FG=Fiberglass	NNN		FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG
	Walls-NNN	W=Wood, C = Concrete, B = Brick, G = Glass, M = Metal, FG = Fiberglass, FB = Fiberboard	NNN		C			C	C	M														C		C	C						C		C	C
OTHER MATERIALS																																					
	Tubes	Mercury containing Fluorescent Tubes	NNN	EA	2	30	8	2	20	8	10		16		30	22	20	10					10	8	40	2	40	8		16	16	4	20			8	2
	Ballasts	PCB Containing Ballasts	NNN	EA	1	15	4	1	10	4	5		8		15	11	10	5					5	4	20	1	20	4		8	8	2	10			4	1
	Smoke Detectors	Lead Acid Batteries	NNN	EA																																	

720 E San Ysidro - OUT BUILDINGS		SECONDARY INSPECTION EAST			SECONDARY INSPECTION WEST			E MECH			W MECH				CONTROL BOOTH	EXIT CONTROL	PERMIT OFFICE			BIRD QUARANTINE			
Material ID	Material Description	OFFICE	TOILET 1	TOILET 2	HOLD	TOILET	OFFICE	FIRST FLOOR	MEZZ	STAIR	FIRST FLOOR	MEZZ	SECOND FLOOR	STAIR	BOOTH	BOOTH	OFFICE	TOILET	TELE	STORAGE	**TOTALS**	**$ PER UNIT**	**$ SUBTOTAL**
-CONTAINING MATERIALS																							
WLPL-611	**Smooth plaster finishing coat over rough, sandy plaster in Corr 2 of East Headhouse**																				**1680**	**$15**	**$31,500**
ASBESTOS CONTAINING MATERIALS																							
TERRAZZO-AAA4	**Black terrazzo with black and white specks**																				**860**	**$20**	**$21,500**
VAPOR-AAA6	**Tar and/or felt vapor barrier assembly in restrooms**		**56**	**36**																	**2327**	**$20**	**$58,175**
FIREDOORS-AAA7	**Asbestos core fire-rated door**																				**15**	**$100**	**$1,875**
BRICK-AAA9	**6" x 6" Red brick ceramic pavers with associated grout and mortar**																				**2426**	**$5**	**$15,163**
PANEL-AAA10	**4' Off-white non-suspect plastic wallboard with associated assumed mastics**																				**320**	**$5**	**$2,000**
PANEL-AAA11	**4' White non-suspect plastic wallboard with associated assumed mastics**																				**360**	**$5**	**$2,250**
PANEL-AAA12	**10' White non-suspect plastic paneling with associated assumed asbestos mastics**	**900**				**250**	**400**														**1550**	**$5**	**$9,688**
TERRAZZO-AAA13	**Blue terrazzo flooring in Secondary Inspection East & West**			**36**	**200**	**25**	**375**											**270**		**180**	**1086**	**$20**	**$27,150**
STOS CONTAINING MATERIALS																							
WLSH-200	Untextured drywall and tape partitions on East Mech First Floor							1125															
BBMAS-201	4" Light gray vinyl baseboard and associated mastics in East Mech							75															
FILTER-202	Grey, cotton-like filter on First Floor of E. Mechanical wall vents							225	225														
WLPL-203	Smooth, painted plaster on lath on E. Mechanical Second Floor walls								1200														
FILTER-400	Tan and green exhaust air filters on Second Floor of West Mech												60										
STSFP-500	Structural fireproofing on beams and decking throughout West Headhouse																						
BBMAS-501	4" Brown vinyl baseboard over 2" brown vinyl baseboard and associated mastics																						
WLSH-502	Untextured, painted drywall and tape on Mezzanine of West Headhouse																						
BBMAS-503	4" Dark brown vinyl baseboard and associated mastic																						
WLSH-504	Off-white, untextured drywall and tape throughout West Headhouse																						
CLLI-505	4' x 2' White, laid-in ceiling tile with stipples and fissures																						
WLCER-506	4" x 4" Off-white, glazed ceramic wall tile and associated grout and mortar in the West Headhouse																						
FLCER-507	1" x 1" Alternating light, medium, and dark brown ceramic floor tile and associated grout and mortar																						
BBMAS-508	4" Light gray vinyl baseboard and associated mastics in West Headhouse																						
FLVCT-509	12" x 12" Beige vinyl composite floor tile with tan and gray streaks with associated mastics and possible black vinyl layer underneath																						
CLPL-510	Hard-top ceiling plaster under roof canopy																						
WLSH-600	Drywall with tape on walls and some ceilings in East Headhouse																						
FLVCT-601	12" x 12" Light gray vinyl composite floor tile with beige streaks and associated mastics																						
BBMAS-602	4" Light gray vinyl baseboard and associated mastics in East Headhouse																						
BBMAS-603	4" Dark gray/green vinyl baseboard and associated mastics in East Headhouse																						
CLLI-604	4' x 2' Laid-in ceiling tile with stipples and fissures																						
STSFP-605	Grey structural fireproofing on beams and decking throughout East Headhouse																						
FLCER-606	2" x 2" Tan ceramic floor tile and associated grout and mortar																						
WLCER-607	4" x 4" Off-white, glazed ceramic wall tile and associated grout and mortar in the East Headhouse																						
CLPL-608	Rough-textured, hard-top plaster on exterior portico and undersides																						
FLVCT-609	12" x 12" Beige vinyl composite floor tile with tan and grey specks and associated yellow and black mastics																						
BBMAS-610	4" Black vinyl baseboard with associated mastics																						
STUCCO-700	Exterior stucco on soffits																						
WLSH-701	White painted drywall with tape and mud	3000	416	468		275																	
FLVCT-702	12" x 12" Blue vinyl composite floor tile with white and gray specks and associated mastics	900	56																				
BBMAS-703	4" Navy blue vinyl baseboard with associated mastics	250	30																				
CLLI-704	2' x 2' White, laid-in ceiling tile with fissures and stipples	1400					250																
STUCCO-800	Exterior stucco on Soffits																						
FLVCT-801	12" x 12" Light blue vinyl composite floor tile with white and gray specks and associated mastics																	500	20				
BBMAS-802	4" Dark gray/green vinyl baseboard and associated mastics in Permit Office																	90	18				
WLSH-803	Beige painted, untextured drywall with tape and mud in Permit Office																	1350	290				
CLLI-804	4' x 2' Laid-in ceiling tile with stipples and fissures in Exit Control and Permit Office															90	500						
ECT MATERIALS																							
Ceiling-NNN	W=Wood, C = Concrete, B = Brick, G = Glass, M = Metal, FG = Fiberglass, FB = Fiberboard				M			C	C	C	C	C	C	C	CP					M			
DUCT-NNN	Non-suspect duct insulation; FG= Fiberglass	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG				FG	FG	FG			
Floors-NNN	W=Wood, C = Concrete, B = Brick, G = Glass, M = Metal, FG = Fiberglass, FB = Fiberboard							C	C	C	C	C	C	C	M	M				M			
PI-NNN	Non-suspect pipe insulation; FG=Fiberglass	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG	FG				FG	FG	FG			
Walls-NNN	W=Wood, C = Concrete, B = Brick, G = Glass, M = Metal, FG = Fiberglass, FB = Fiberboard				M			C	C	C	C/M	C/M	C/M	C	M	M				M			
TERIALS																							
Tubes	Mercury containing Fluorescent Tubes				4	2	8	12	50	8	32	0	0		4	4				4			
Ballasts	PCB Containing Ballasts				2	1	4	6	25	4	8	0	0		2	2				2			
Smoke Detectors	Lead Acid Batteries																						

Attachment 4

Sampling Location Drawings



Attachment 5

Photographs

Above & below: East Mechanical mechanical equipment & non-suspect PI-NNN

Above & below: East Mechanical mechanical equipment & non-suspect PI-NNN

Above: East Mechanical mechanical equipment & Non-suspect PI-NNN

Below: HA WLSH-200

WLSH-200 Expanded view

Above: HA WLSH-200

Below: HA BBMAS-201

Above: HA FILTER-202

Below: HA WLPL-203

Above: HA CLLI-304

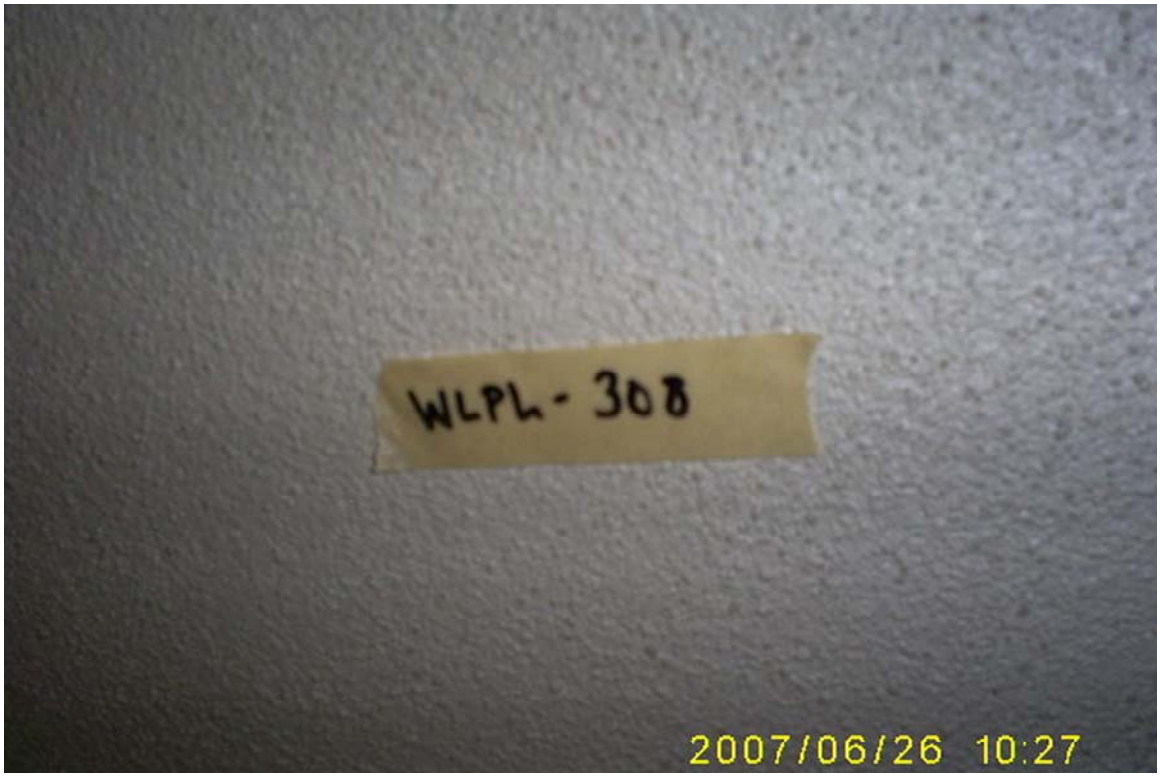
Below: View above 720 Main Office Building dropped ceiling;
HA STSFP-305 & Non-suspect HVAC-NNN

Above: HA STSFP-305

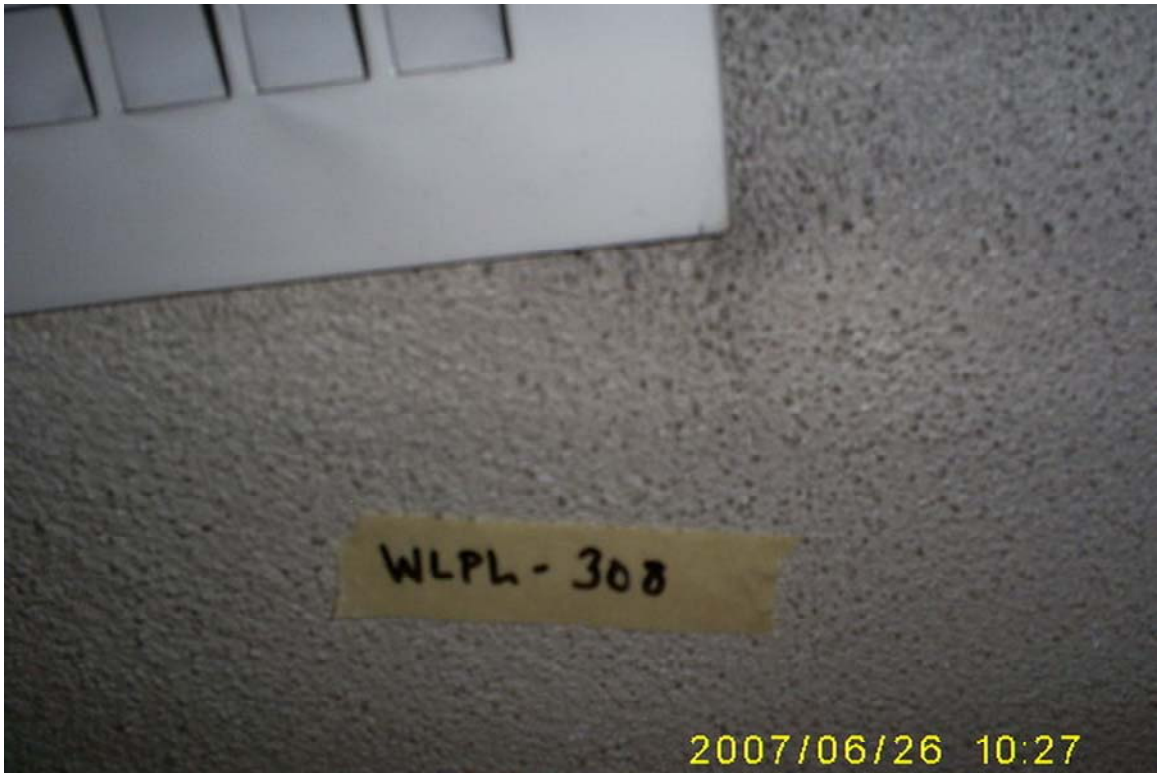
Below: HA'S BBMAS-302 & FLVCT-303

Above: HA WLCER-307

Below: HA FLCER-306

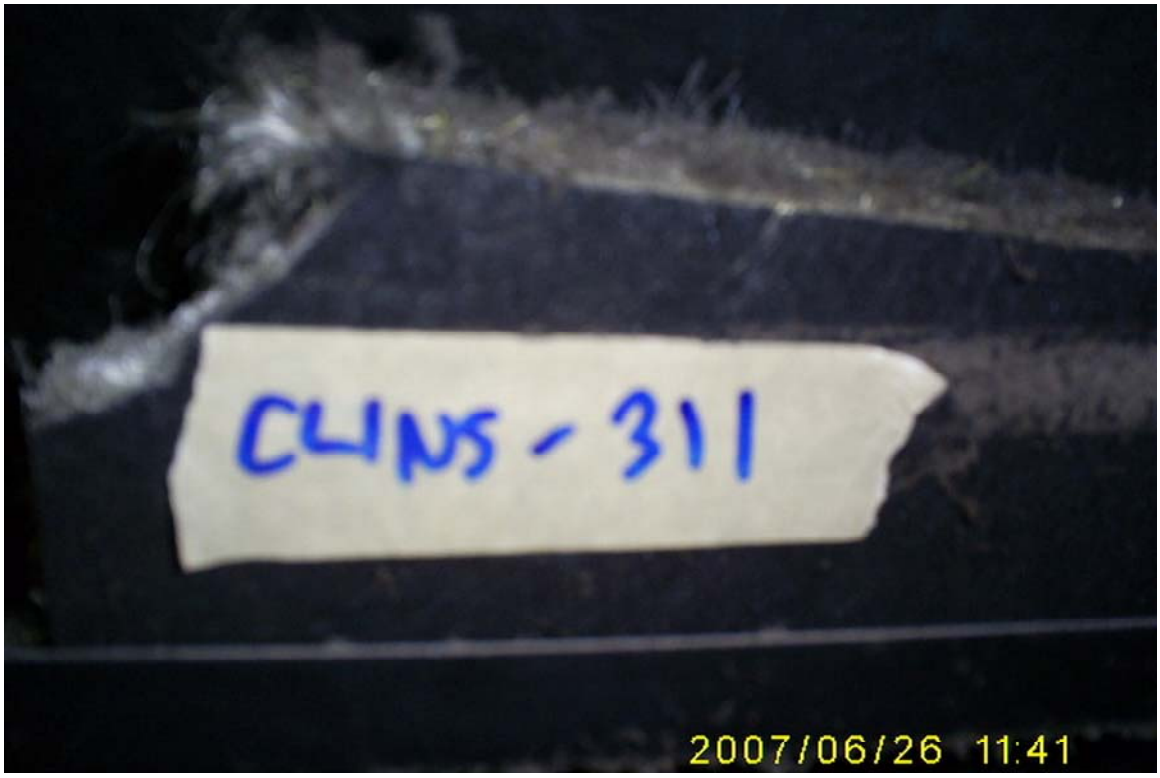


Above & below: HA WLPL-308



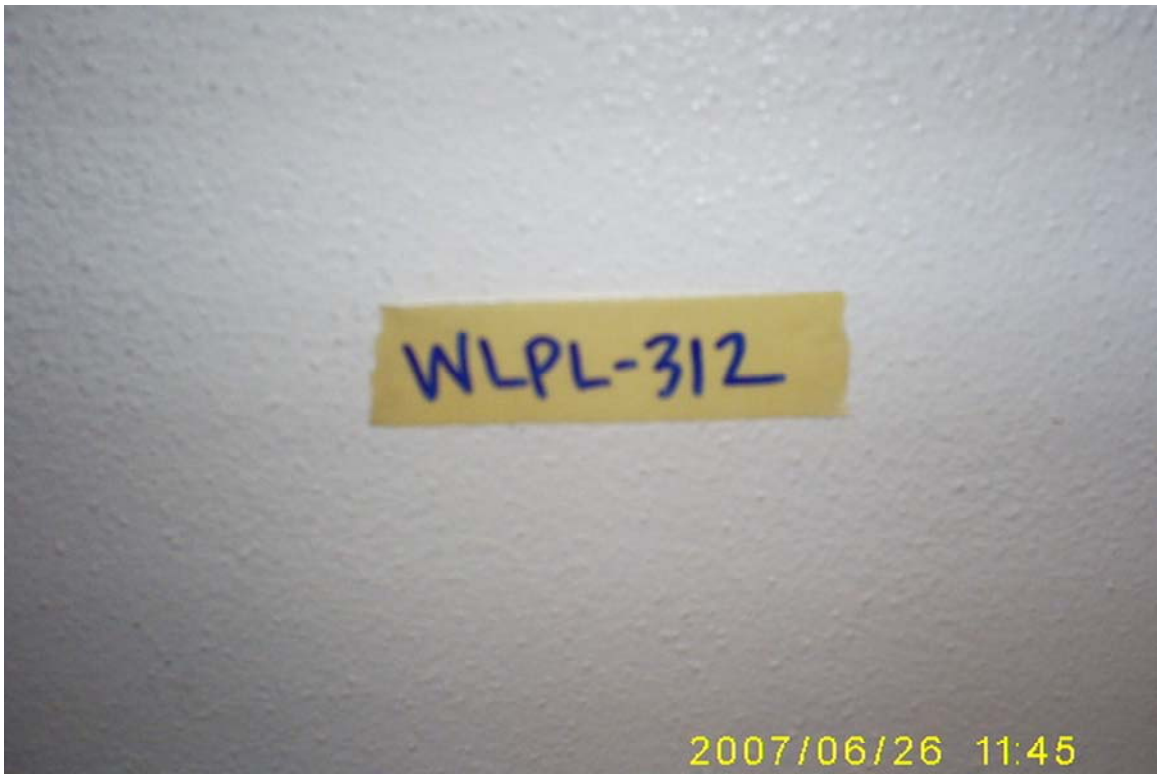
Above: HA BBMAS-309

Below: HA FLVCT-310



Above: CLINS-311

Below: HA WLPL-312

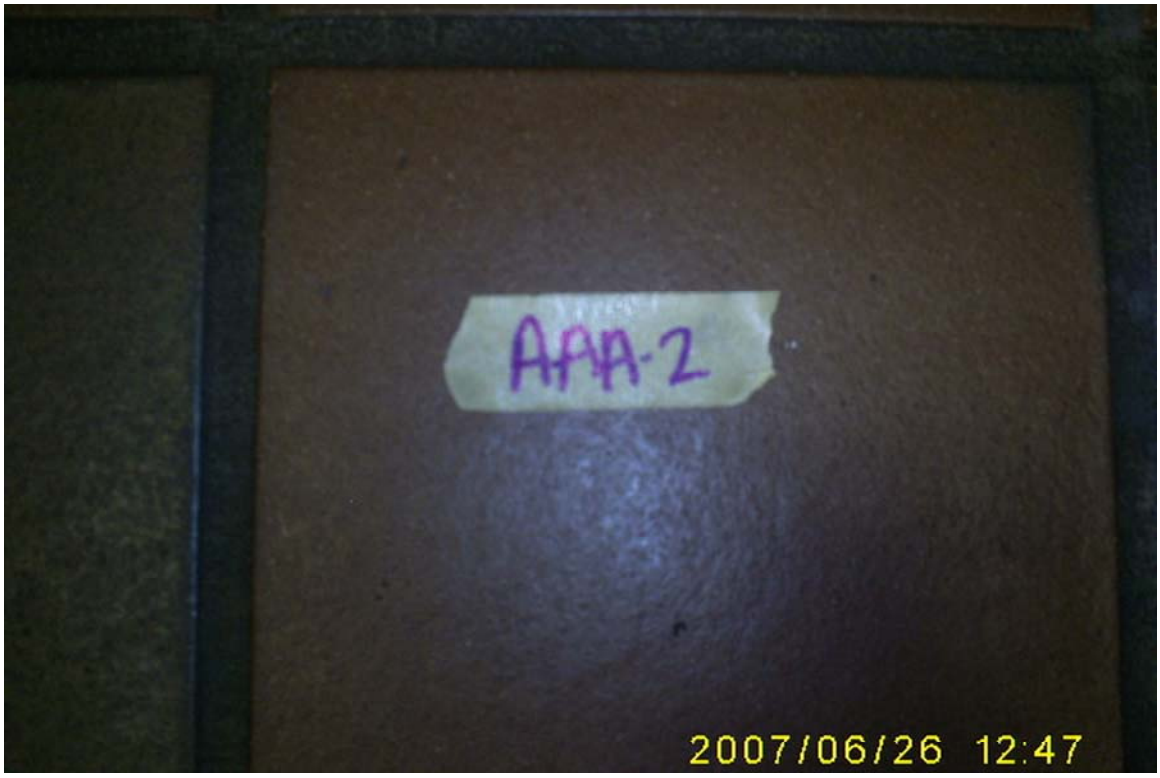


Above: WLPL-312

Below: HA PANEL-AAA1

Above: HA FLVCT-313

Below: HA BBMAS-314

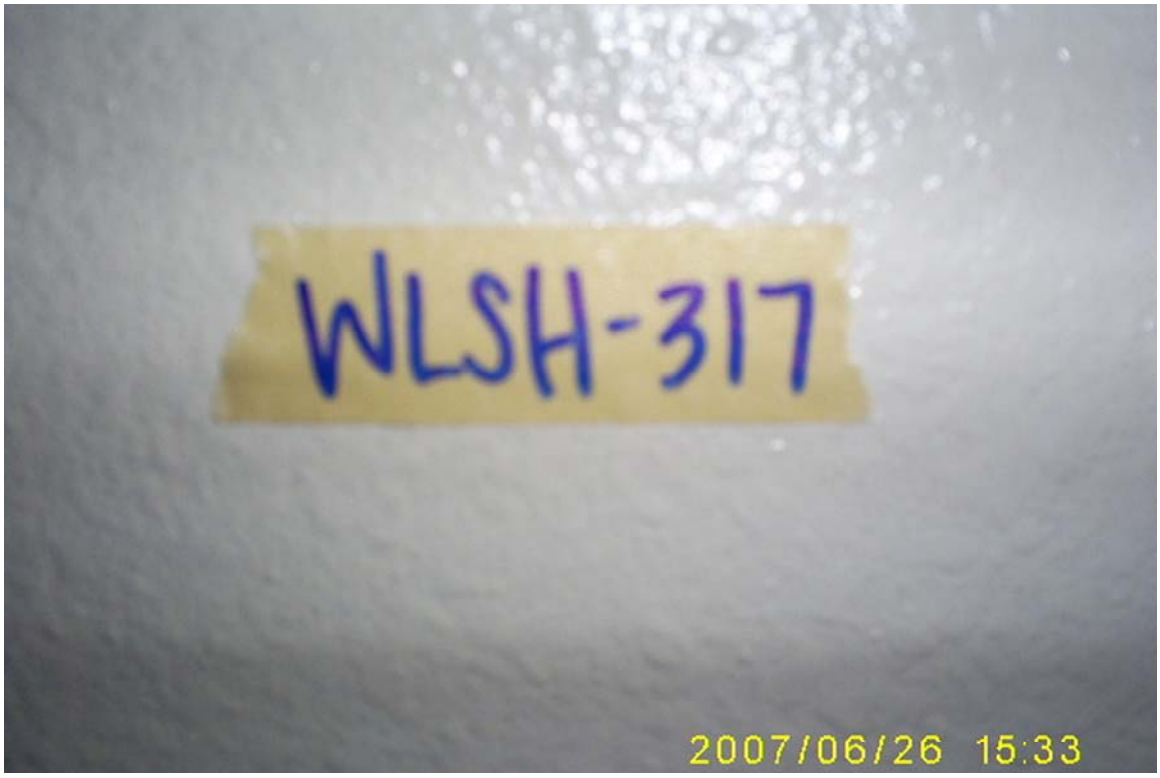


Above: HA AAA-2

Below: HA AAA-8

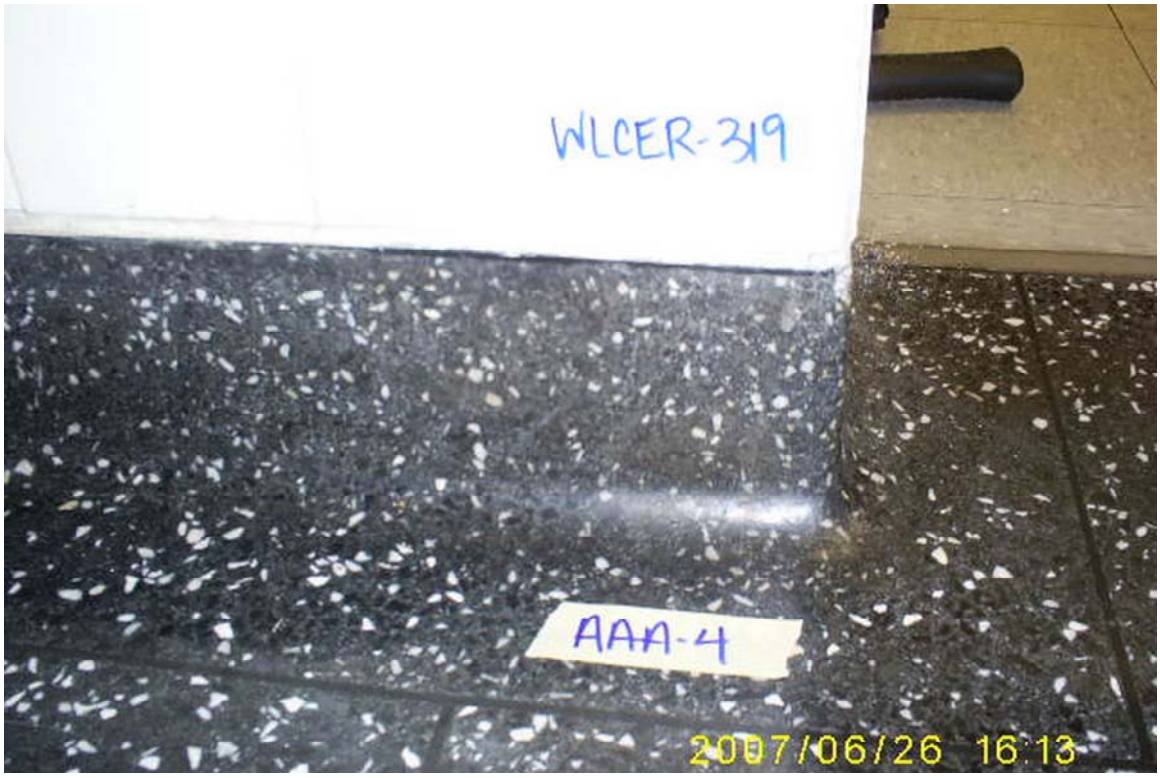
Above: HA'S BBMAS-316 & FLVCT-315

Below: HA FLVCS-AAA3



Above: HA WLSH-317

Below: HA CLPLAC-318



Above: HA WLCER-319 & AAA-4

Below: HA BBMAS-320

Above: HA BBMAS-321

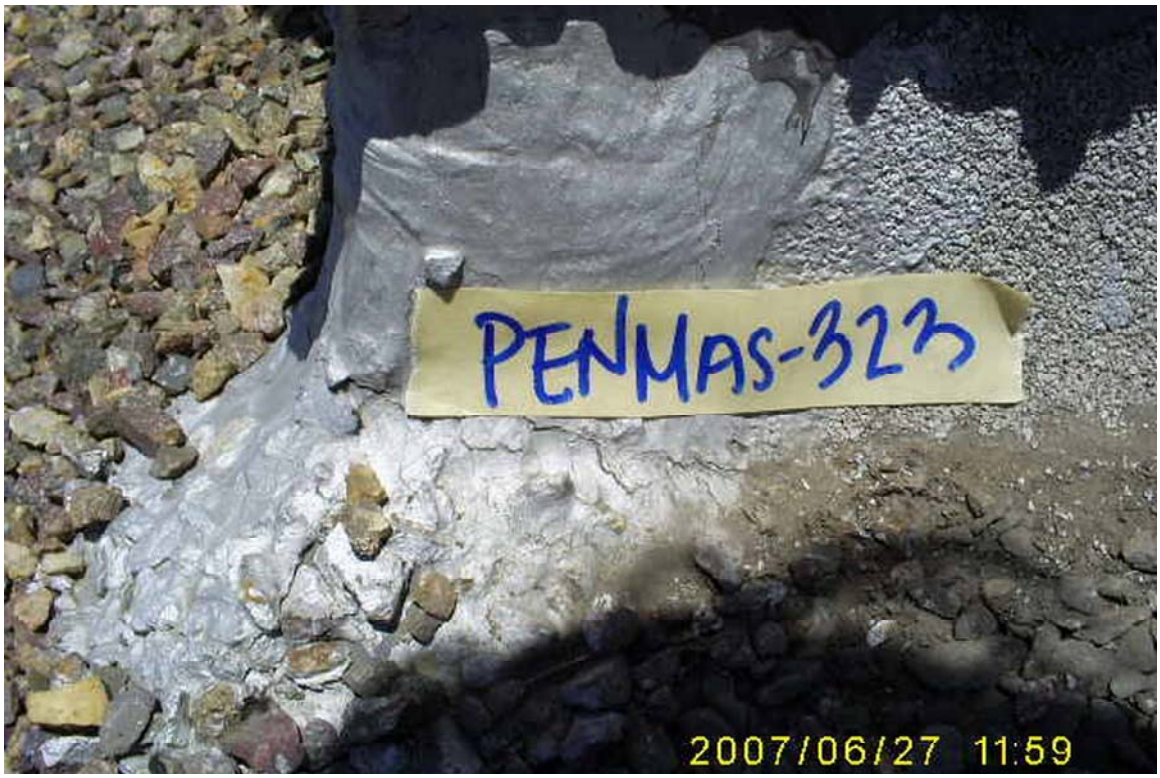
Below: HA CLPL-322

Above & below: View of roofs, HA-AAA5

Above & below: View of roofs, HA-AAA5

Above: HA AAA-5

Below: PENMAS-323



Above: PARMAS-324

Below: HA STSFP-300; View of Main Canopy Soffit from below into maintenance access hatch

Above: HA STSFP-300; Main Canopy Soffit from below

Below: Damaged Non-ACM HA DHWMUD-325 canvas wrapping

Above & below: HA STSFP-300

Above & blow: Main Canopy Soffit;
HA STSFP-300 & DHWMUD-325 & non-suspect PI-NNN

Above: HA Filter-400

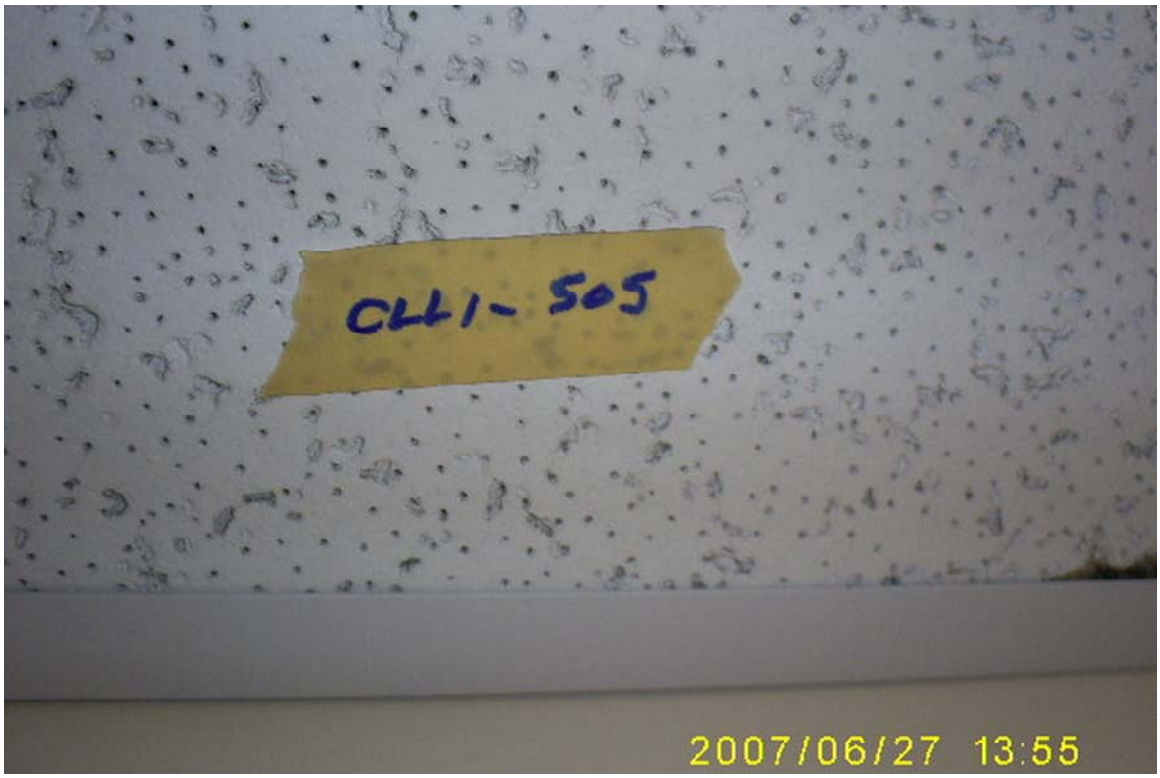
Below: STSFP-500

Above: HA BBMAS-501

Below: WLSH-502

Above: HA's WLSH-504, BBMAS-503 & BRICK-AAA9

Below: CLLI-505

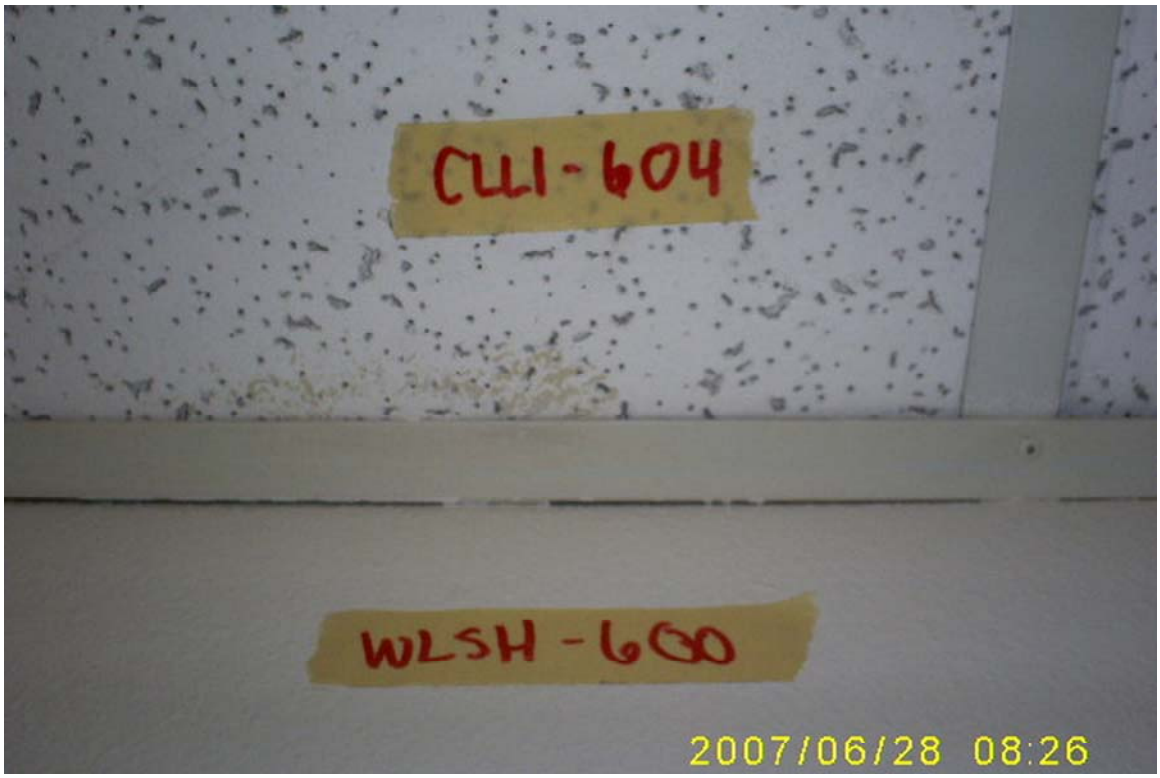


Above: HA's WLCER-506 & FLCER-507

Below: HA's PANEL-AAA10 & BBMAS-508

Above: HA FLVCT-509

Below: HA's WLSH-600 & CLLI-604



Above: HA BBMAS-603

Below: HA's FLVCT-601 & BBMAS-602

Above & below: HA STSFP-605

Above & below: HA STSFP-605

Above: HA FLCER-606 & WLCER-607

Below: HA CLPL-510

Above: HA CLPL-608

Below: HA BBMAS-610 & FLVCT-609

Above: HA PANEL-AAA11

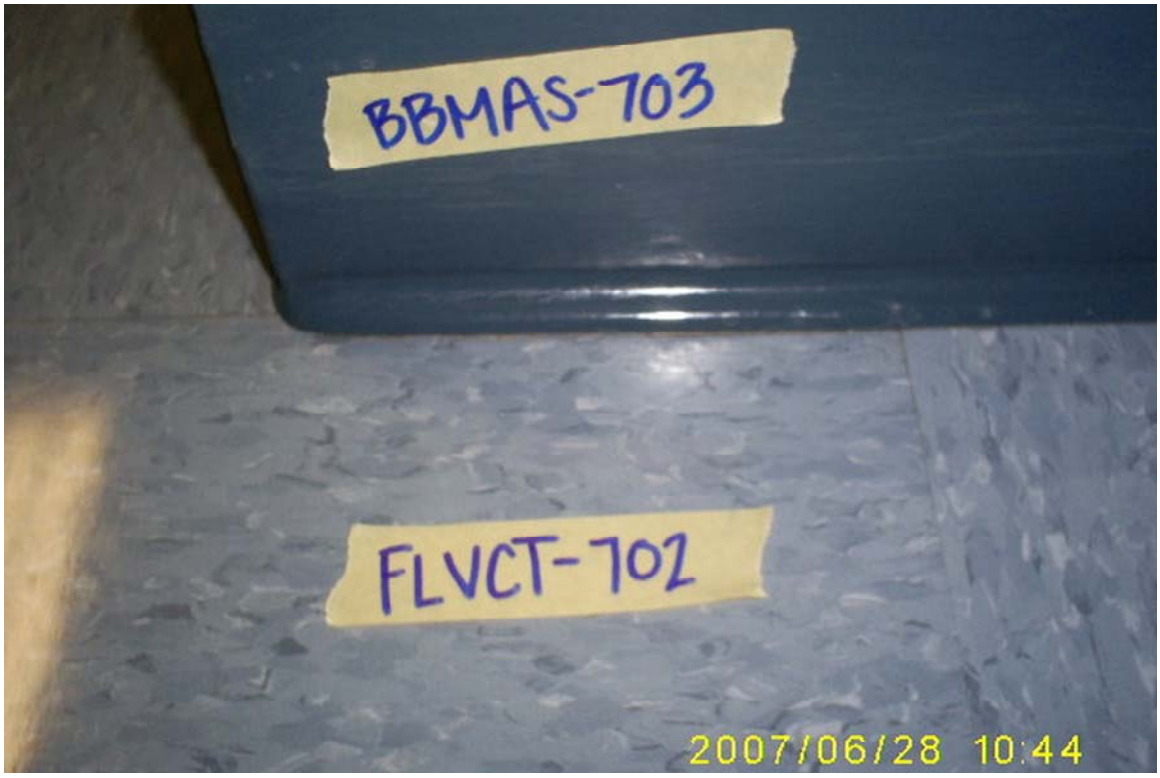
Below: HA TERRAZZO-AAA4

Above: HA WLPL-611

Below: HA's CLLI-704 & WLSH-701

Above: HA TERRAZZO-AAA13

Below: HA PANEL-AAA12



Above: HA's BBMAS-703 & FLVCT-702

Below: HA STUCCO-700

Above: HA STUCCO-800

Below: HA's BBMAS-801 & FLVCT-801

Above: HA WLSH-803

Below: HA CLLI-804

Attachment 6

2002 Cal Inc. Environmental Compliance Audit Report

CAL INC

FINAL
ENVIRONMENTAL COMPLIANCE AUDIT REPORT

SAN YSIDRO PORT OF ENTRY MAIN BUILDING
720 EAST SAN YSIDRO BOULEVARD
SAN YSIDRO, CALIFORNIA

CONTRACT NO. GS-09P-02-KSA-0036
AWARD NO. P-09-02-NQ-0001

PREPARED ON BEHALF OF:

GSA

GENERAL SERVICES ADMINISTRATION
REAL PROPERTY PROGRAMS DIV., 9PM
450 GOLDEN GATE AVE., 4TH FLOOR EAST
SAN FRANCISCO, CA 94102-3434

PREPARED BY:

CAL INC
2040 PEABODY ROAD, SUITE 400
VACAVILLE, CALIFORNIA 95687

SEPTEMBER 2002

JOB # 7744

TABLE OF CONTENTS

LIST OF ATTACHMENTS

1.0 INTRODUCTION

This report presents the results of an Environmental Compliance Audit conducted for the San Ysidro Port of Entry Main Building (CA0588GG) located at 720 East San Ysidro Boulevard, San Ysidro, San Diego County, California. The audit was completed pursuant to General Services Administration (GSA) Contract Number GS-09P-02-KSA-0036, Award Number P-09-02-NQ-0001.

1.1 Purpose and Scope of Work

The purpose of this audit was to verify compliance with environmental requirements, evaluate the effectiveness of in-place environmental management systems and assess the risks from regulated and unregulated materials and practices. The report format and scope of work employed in the execution of Award P-09-02-NQ-0001 was based on GSA's *Environmental Audit Statement of Work—Environmental Compliance Audit* dated March 5, 2002 and the ASTM Standard Practice for Environmental Regulatory Compliance Audits (ASTM E 2107-00).

The audit process included a site inspection, interviews, a regulatory agency file review, and facility environmental records review. An examination of the environmental programs at the San Ysidro Port of Entry Main Building was made to evaluate compliance with federal, state and local regulations in the following areas:

- Air programs;
- Asbestos programs;
- Drinking water;
- Water pollution;
- Polychlorinated biphenyls;
- Hazardous materials use and storage;
- Hazardous waste generation, storage and disposal;
- Solid waste; and
- Underground storage tanks.

2.0 SITE ASSESSMENT

2.1 Property Description

The San Ysidro Port of Entry Main Building is located at 720 East San Ysidro Boulevard in San Ysidro, San Diego County, California. (Please refer to Figures in Attachment 1). The building, built in 1972, contains approximately 186,432 square feet of space consisting mainly of office spaces, vehicle inspection lanes and pedestrian inspection areas. The facility houses the administrative and enforcement staff and offices for the tenant agencies. Building materials at the facility consist of steel beams, concrete, carpeting, gypsum wallboard, acoustical ceiling tiles and vinyl floor tiles. The building is used by tenant agencies to conduct administrative and enforcement operations, which includes the screening, processing and detaining of personnel

violating Federal Regulations and provide customer service to personnel traveling into the United States from Mexico.

2.2 Property Tenants

The San Ysidro Port of Entry Main Building is occupied by United States Customs, United States Immigration and Naturalization Service, United States Department of Agriculture and General Services Administration Contract Security Office.

2.3 Opening Conference

An opening conference was held on July 9, 2002 with representatives from CAL INC and General Services Administration (GSA) to discuss the purpose and scope of the environmental compliance audit. During this conference, information was gathered about the facility's operations, environmental programs and mechanical equipment. Interviews were also held during the opening conference to discuss information related to audit criteria. The Environmental Compliance Audit interview checklist can be found in Attachment 2.

2.3.1 Interviews

Ms. Regina Willis, Property Manager, General Services Administration

Ms. Regina Willis was interviewed during the opening conference of the environmental compliance audit on July 9, 2002. Ms. Willis provided information regarding facility tenants, building operations, equipment operating permits and hazardous waste generation. Ms. Willis also provided facility records for review, including but not limiting to, operating permits, indoor air quality surveys, hazardous waste manifests, asbestos sampling data and the facility hazardous material business plan.

Mr. Ramon Soto, Maintenance Technician, One Source Energy Services

Mr. Ramon Soto was interviewed during the environmental compliance audit on July 9, 2002. Mr. Soto is employed by the facility maintenance contractor, One Source Energy Services. Mr. Soto provided information regarding hazardous material storage, material safety data sheets, polychlorinated biphenyls, equipment maintenance and employee training programs. Mr. Soto provided equipment maintenance records for review. Mr. Soto also led the site walk of the facility during the environmental compliance audit.

2.4 Physical Facility Inspection

Ms. Marifrances Hines of CAL INC and Ramon Soto of One Source Energy Services conducted a physical facility inspection on July 9, 2002. The purpose of this inspection was to assess areas of environmental compliance associated with the San Ysidro Port of Entry Main Building. Environmental checklists completed during the inspection are presented in Attachment 3. Photographs taken during the inspection are presented in Attachment 4.

3.0 ENVIRONMENTAL PROGRAM OBSERVATIONS

The Environmental Compliance Audit examined the following environmental programs at the San Ysidro Port of Entry Main Building: air programs, asbestos, drinking water, storm water, polychlorinated biphenyls, hazardous waste and hazardous materials.

3.1 Air Programs

An examination of air programs at the San Ysidro Port of Entry Main Building included one emergency generator, one aboveground storage tank, three boilers, two cooling towers, two chillers and indoor air quality.

3.1.1 Emergency Generators

One Cummins, Model VT12-635-GS, serial number 10480745, 300KW emergency generator is located on the roof of the East Mechanical Building. Diesel fuel to the generator is supplied by a 120-gallon day tank, which is supplied by a 1500-gallon aboveground storage tank. According to Regina Willis, the emergency generator will soon be removed from the facility and replaced with a larger unit.

The facility provided a *Certificate of Registration (NO 970170)* for the operation of the emergency generator as required by the County of San Diego Air Pollution Control District Regulation II, Rule 10(b). A copy of the *Certificate of Registration* can be found in Attachment 5.

According to Ramon Soto, generators receive monthly preventative maintenance. Generator maintenance records are maintained at the facility as required by permit operating conditions. Maintenance records for the last three months can be found in Attachment 6.

The facility has been issued a Notice of Violation and a Notice to Comply by the Air Pollution Control District. A *Notice of Violation* was issued on June 24, 1998 for operating an internal combustion engine without authorization. The facility currently maintains a *Certificate of Registration* for the emergency generator, which is valid until April 1, 2003. A *Notice to Comply* was issued on October 16, 2001 for not maintaining and posting a permit to operate in the vicinity of the emergency generator. During the site walk, a copy of the *Certificate of Registration* was observed in the certificate display cabinet located in the Boiler Room. (Please refer to Attachment 7 for the Air Pollution Control District Notice to Comply and Notice of Violation).

3.1.2 Aboveground Storage Tanks

A 120-gallon day tank located on the roof supplies diesel fuel to the emergency generator. The tank is double walled to prevent the release of tank contents in the event of a spill or leak. Minimum staining was observed at the pipe connections of the day tank.

The day tank is supplied by a 1500-gallon aboveground storage tank located in the facility Transformer Area. The Enviro-Fault tank was installed in 1996 and has a leak detection system that is monitored by an Incon TS-1000EFI. Evidence of staining or leaks was not observed in the vicinity of the aboveground storage tank. A County of San Diego Department of Environmental Health *Health Permit* was provided for the operation of a 1500-gallon aboveground storage tank. A copy of the permit was observed in the certificate display cabinet located in the Boiler Room and can be found in Attachment 5.

The facility contains three hydraulically powered elevators. The elevators are each supplied by a hydraulic oil storage tank (Host). Evidence of floor drains or fuel releases were not observed in the vicinity of the hydraulic storage tanks.

3.1.3 Heating, Ventilation and Air Conditioning

3.1.3.1 Boilers

Three naturally gas fueled, Raypak heating hot water boilers are located in the Boiler Room of the East Mechanical Building. According to Regina Willis, the boilers are exempt from San Diego Air Pollution Control District permitting requirements. GSA Certificates of Inspection of Pressure Vessels were posted in the certificate display cabinet located in the Boiler Room.

The three Raypak boilers have recently been installed at the facility. The boilers replaced two older boilers at the facility that were permitted by the San Diego Air Pollution Control District. The facility notified the Air Pollution Control District when the boilers were removed from service. A letter from the Air Pollution Control District was provided by the facility indicating that Boiler Permit No. 4791 and 4792 were retired on May 8, 2002. (Please refer to Attachment 5 for a copy of the Air Pollution Control District letter).

3.1.3.2 Cooling Systems

Two Evapco closed loop cooling towers were installed on July 1, 2001 on the roof of the East Mechanical Building. Water supplied to the cooling towers is disinfected by the addition of CWT-1. The chemicals, which are stored in double insulated containers, are added to the water by an automatic injection system. Labels were not affixed to the chemical containers as required by the California Code of Regulations (CCR), Title 8, Section 5194.

The Air Pollution Control District issued the facility a *Notice to Comply* on October 16, 2001 for not registering the cooling tower. (Please refer to Attachment 7). The facility submitted a *Rule 1202-Cooling Tower Registration Form* to the Air Pollution Control District on October 22, 2001 for an Evapco Cooling Tower. A copy of the cooling tower permit application was posted in certificate display cabinet located in the Boiler Room and can be found in Attachment 5. The cooling tower permit to operate was not available during the environmental compliance audit.

Two Carrier 23XL screw type chillers are located in the Chiller Room of the East Mechanical Building. The water supplied to the chillers is disinfected by the addition of CHL-1.

3.1.4 Indoor Air Quality

Several industrial indoor air quality surveys have been performed at the San Ysidro Port of Entry. On August 18-20, 1998, the National Institute for Occupational Safety and Health (NIOSH) performed an assessment of the ventilation systems. The *Potential Options for the Control of Border Agents Exposure to Vehicle Emissions* survey presented potential options that could reduce border agent exposure to car exhaust gases. The survey report can be found in Attachment 8.

The following table presents industrial hygiene data from the indoor air quality surveys provided by the facility. Copies of the survey reports can be found in Attachment 8.

SUMMARY OF INDOOR AIR QUALITY SURVEYS
SAN YSIDRO PORT OF ENTRY

DATE	REASON FOR SURVEY	LOCATION	CONDUCTED BY	SAMPLE RESULTS	RECOMMENDATIONS
9/1/95	Air Quality Follow Up Survey	Main Port Building Room 2004	Melvin T. Okawa (GSA)	Carbon Monoxide = 1-2 parts per million Carbon Dioxide = 500 parts per million	- No Recommendations.
7/3-7/82	Air Quality Survey	Primary and Secondary Inspection Areas	U.S. Immigration & Naturalization Industrial Hygienist	Carbon Monoxide = 2.2-74.5 parts per million (Time weighted average of 9-28 parts per million)	-No Recommendations.
7/7/82	Air Quality Survey	GSA Building	U.S.D.O.L. Industrial Hygienist	Carbon Monoxide = <2 parts per million Total Hydrocarbons = <2 parts per million Inorganic lead = non detect	- Clean the ventilation ducts periodically to remove unfiltered dust accumulation.

3.1.4.1. Radon

Based on Environmental Protection Agency (EPA) information sources, radon surveys were conducted in 3141 counties across the United States. Generalized results of the survey placed each of the counties into one of three radon zones. Each zone designation reflects the average short radon measurement that can be expected to be measured in a building without the implementation of radon control methods. San Diego County is designated as Radon Zone 3 – Low Potential (less than 2 pico curies per liter [pCi/L]). The EPA action level is radon concentrations greater than 4 pCi/L.

3.2 Asbestos

An Asbestos Facility Action Plan was provided during the site visit. The Action Plan was developed using a preliminary asbestos survey and assessment of the building that was conducted in September 1987. The September 1987 survey and assessment was not provided during the environmental compliance audit. According to the Action Plan, asbestos is present in

acoustical ceiling and fireproofing located in various areas of the facility. It outlines the abatement needs of the facility, education and training procedures, the operations and maintenance program and air sampling frequency. Since the 1987 survey and assessment, asbestos abatement has been performed at the facility. Hazardous waste manifests for the removal of asbestos-containing materials are maintained at the facility as required by the California Code of Regulations (CCR), Title 22, Section 66262.4. The facility does not actively perform the procedures outlined in the Asbestos Action Plan.

Asbestos training records could not be provided during the environmental site visit. According to Regina Willis, training files are kept off-site at the Federal Building. The maintenance representative was questioned regarding formal asbestos training. He indicated that no asbestos or hazardous material training has been conducted during his employment with the maintenance contractor.

The following table presents information from the asbestos survey and sampling data provided by the facility. (Please refer to Attachment 9 for copies of the asbestos survey reports).

SUMMARY OF ASBESTOS SURVEYS
SAN YSIDRO PORT OF ENTRY

DATE	REASON FOR SURVEY	LOCATION	CONDUCTED BY	SAMPLE RESULTS	RECOMMENDATIONS
7/10/98	Air Clearance Sampling	Main building, 1st Floor, Electrical Room, East Hallway, Lunch Room	The Szaras Companies (TSC)	<14.6 fibers per cubic centimeter	N/A
6/13/97	Bulk Sample Analysis	Boiler Room Insulation	Deign for Health Inc.	50-60% Chrysotile 5-10% Amosite 3-5% Cellulose	N/A
2/19/97	Bulk Sample Analysis	Fireproofing	Deign for Health Inc.	10-25% Chrysotile 2-5% Cellulose	N/A
3/12/91	Air Monitoring	San Ysidro Border Station (Room 2132, 2103, 2202A, 1237, corridor and stairwell)	Health and Safety Services Inc.	<0.01-0.009 fibers per cubic centimeter	-All samples meet or exceed EPA requirements for reoccupancy following abatement work.
12/27/90	Air Monitoring	Room 2103, 2132, 2202A, 1237, hallway, stairwell	Health and Safety Services Inc.	<0.01-0.006 fibers per cubic centimeter	N/A
6/28/90	Air Monitoring	Room 2132, 2103, 1237, hallway and stairwell	Health and Safety Services Inc.	<0.003-0.005 fibers per cubic feet	-All samples meet or exceed EPA requirements for reoccupancy following abatement work.

3.3 Drinking Water Quality

Water quality sampling has not been conducted at the facility. According to Regina Willis, complaints related to water quality have not been reported.

3.4 Storm Water

Storm water at the facility flows to the municipal storm water system and is not treated or permitted prior to discharge. Based on the use of the property, storm water discharge permits would not be required.

3.5 Polychlorinated Biphenyls

According to Ramon Soto, polychlorinated biphenyls are not contained in the fixtures, transformers, capacitors or fluorescent light ballasts at the facility. However, information regarding sampling for the presence of polychlorinated biphenyls was not provided by the facility.

3.6 Hazardous Waste

The California Department of Toxic Substances Control (DTSC) issues hazardous waste EPA ID Numbers to track hazardous materials from origin to final disposal. According to Regina Willis, the facility tenant, US Customs, produces hazardous waste during vehicle dismantling and drug confiscation.

Hazardous waste manifests are maintained at the facility in accordance with California Code of Regulations (CCR), Title 22, Section 66262.49. The facility provided hazardous waste EPA ID numbers and manifests for the disposal of asbestos, lead and diesel hazardous waste for the past twelve years. The following table summarizes the hazardous waste history for the facility. (Prefer to Attachment 10 for copies of hazardous waste manifests).

FACILITY HAZARDOUS WASTE MANIFESTS

Hazardous Waste Manifest Number	Waste Description	Quantity	Date of Disposal
CAL000027578	Non RCRA Hazardous Waste Solid (Lead)	400 pounds	6/20/00
CAL000026437	R.Q. Asbestos, 9, NA2212, PG111	¼ cubic yard	3/7/97
CAC000907952	RQ, Asbestos Class 9, NA 2212, PG. 111	260 pounds	7/12/96
CAC000997952	(Diesel) Non RCRA Hazardous Waste Liquid	500 gallons	5/22/96
CAL000026437	(R.Q.) Asbestos, 9 NA2212, PG111	1 cubic yard	4/16/96
CAC000907952	RQ, Asbestos Class 9, NA 22112, PG. 111	47 bags	2/7/96
CAL000019873	R.Q. Waste Hazardous Substance, Solid N.O.S. ORM-E NA 9188 (Asbestos)	56 cubic yards	6/19/92
CAL000019873	R.Q. Waste Hazardous Substance, Solid N.O.S. ORM-E NA 9188 (Asbestos)	80 cubic yards	6/19/92
CAL000027578	Waste Hazardous Substance, Solid N.O.S., ORM-E, NA 9189 (Asbestos) RQ	1500 pounds	4/27/90
CAL000027578	Asbestos Waste	2000 pounds	4/19/90

3.7 Hazardous Materials

A Hazardous Material Business Plan is maintained by the facility in accordance with the California Code of Regulations (CCR) Title 19, Division 2, Chapter 4, Section 2620-2734 and

Safety Code Chapter 6.95, Article 1, Sections 25500-25520. The Hazardous usiness Plan, last revised on January 3, 1999, does not reflect current facility ι. The plan identifies the previous property manager and contractor no longer located ty as the personnel responsible for performing notification procedures. Spill response procedures and employee training descriptions and frequency were not consistent ɔnmental compliance audit findings. Spill response kits were not observed in any of ɔus material storage areas and training records could not be provided during the site se refer to Attachment 11 for a copy of the Hazardous Material Business Plan).

; materials at the San Ysidro Port of Entry Main Building are stored in the following ler Room, Paint Storage Room, Maintenance Shop, Flammable Storage Cabinet and Storage Cabinet. A current facility hazardous material inventory was not available site visit. The hazardous materials observed during the site walk are described below.

r Room contained a corrosive storage cabinet. The following materials were observed rosive cabinet: 5 (5-gallons) containers of CWT-31ZP and 1 gallon of compressor oil. of floor drains or staining was not observed near the hazardous materials.

t Storage Room is located in Room 115. The room contained no evidence of floor vidence of staining was not observed at or near hazardous materials. The following s materials were observed in the Paint Storage Room.

PAINT STORAGE ROOM

Quantity	Unit	Description
1	55-gallon drum	Cool-Rite Coil Cleaner
6	Spraycans	Kilz Original Primer
4	Gallon	Drylok Concrete Floor Paint
16	Gallon	Paint
1	4 Gallons	M4092 Floor Adhesive
1	5 Gallons	CWT1
1	5 Gallons	CHL1
1	5 Gallons	Acti-Kean Coil Cleaner
5	5 Gallons	CWT 31
7	5 Gallons	Latex Paint
1	Gallon	Foster 30-36 Sealfas Coating
1	5 gallon	Flammable Liquid Storage Container

lous materials were observed in the Maintenance Shop. A Material Safety Data Sheet was located outside the Maintenance Shop. Evidence of floor drains or staining was not ed in the vicinity of hazardous materials. Compressed gas cylinders in the Maintenance were not properly secured. The following materials were observed in the Maintenance

MAINTENANCE SHOP

Quantity	Unit	Description
2	Gallon	Paint
1	30 Pounds	R-22 Refrigerant
1	30 Pounds	R-12 Refrigerant
1	12 Pounds	Joint Compound
1	25 Pounds	Sanded Tile Grout
1	12 Pounds	Greased Lagging Adhesive
2	Gallon	Pre-Mixed Concrete Patch
1	Gallon	Glenkote Seal-Flex
2	32 Ounces	Concrete Filler
1	3 Gallon	Multipurpose Adhesive
1	14.75 Pounds	Spackling Paste
4	14.1 Ounces	Propane
1	Cylinder	Carbon Dioxide

A flammable storage cabinet is located outside for the landscaping contractor, Job Options. The following materials were observed in the flammable storage cabinet.

LANDSCAPING FLAMMABLE STORAGE CABINET

Quantity	Unit	Description
1	2.5 Gallon	Herbocide Mecomec
1	Gallon	Sarvon Organic Soil Enhancer
1	Pint	Insect Killer
4	Quart	Transmission Fluid
3	Gallon	Flammable Liquid Storage Container
2	Gallon	Unlabeled Containers

A Janitorial Storage Room is located at the facility. Material Safety Data Sheets for hazardous materials were located outside the Storage Room. Evidence of floor drains or staining was not observed near the hazardous materials. The following materials were observed in the Janitorial Storage Room.

JANITORIAL STORAGE ROOM

Quantity	Unit	Description
11	3 Liters	Disinfectant Bathroom Cleaner
8	3 Liters	Neutral Cleaner
8	3 Liters	Glass and Surface Cleaner
5	3 Liters	General Purpose Cleaner
5	128 fluid ounces	Superior Hand Soap
1	8 Ounces	WD-40
7	15 Ounces	Metal Sheen Steel Cleaner and Polish
4	6 Ounces	Gum Away II
7	12 Ounces	Carpet and Room Deodorizer
9	10 Ounces	Lemon Peel
6	32 Ounces	Ezymatic Cleaner
1	128 Ounces	Limelite Lime and Scale Remover
2	128 Ounces	Multi-Scrub
5	32 Ounces	Butchers Pullout
1	5 Gallon	Clean Assist
1	5 Gallon	Balance pH Neutral Cleaner

3.7.1 Material Safety Data Sheets

Material Safety Data Sheet (MSDS) are maintained for hazardous materials located at the San Ysidro Port of Entry Main Building in accordance with the California Code of Regulations (CCR), Title 8, Section 5194. MSDS binders are located in the Property Manager's office, outside the Janitorial Storage Room and outside the Maintenance Shop.

A review was conducted of the facility's materials safety data sheets located in the Property Manager's office. Many of the MSDSs are dated from 1987 to 1997. Based on that observation, the MSDSs may not accurately reflect the manufacturers most current versions. Manufacturers of hazardous substances are required to produce material safety data sheets and update them as they become aware of significant information regarding the hazards of a substance or ways to protect against the hazards, according to the California Code of Regulations (CCR), Title 8, Section 5194.

3.8 Solid Waste

A recycling program has been developed and implemented at the San Ysidro Port of Entry Main Building. Recyclable materials, including paper and cardboard, are placed in paper recycling bins located throughout the facility. The recyclable materials are removed and recycled by Fibre Resource Limited. According to Ramon Soto, used oil and batteries are collected and recycled at the local recycling center once a quarter. The facility could not provide hazardous waste manifests for the disposal of used oil. According to the County of San Diego Department of Environmental Health, oil waste must be disposed of using an EPA ID number and hauled away by a registered waste hauler.

Solid waste refuse is collected and removed by Pacific Waste Management. Yard waste, including tree clippings, grass and soil, is collected at the facility by the landscaping contractor, Job Options, and disposed of as general waste refuse. Fluorescent light bulbs at the facility are disposed of as solid waste. The facility also has a natural gas incinerator that is used for the destruction of confiscated fruit and agriculture entering the United States from Mexico.

3.9 Underground Storage Tanks

One 10,000-gallon diesel underground storage tank was removed from the site in 1996. The underground storage tank was replaced with a 1500-gallon aboveground storage tank. A closure report for the underground storage tank could not be provided during the site visit. Hazardous material manifests for the underground storage tank removal were provided by the facility as described in Section 3.6 Hazardous Waste.

A record request was submitted to the County of San Diego, Department of Environmental Health for information regarding the facility. A closure report was found in the facility files for the removal of a 10,000-gallon underground storage tank. The Site Assessment and Mitigation Division determined that no further action was required and an *Underground Storage Tank System Closure Report* was issued to the facility on May 23, 1996. (Please refer to Attachment 12).

4.0 RECORDS REVIEW

A review of federal, state and local public records, and available environmental reports was made to assess the regulatory compliance history of the facility. The information presented in this section is based on information from regulatory agency databases, and the results of verbal and written contacts with federal, state, and local agencies.

4.1 Environmental Data Resources Database Review

Federal and state records were evaluated through a review of an environmental database search conducted by Environmental Data Resources, Inc. (EDR). The database search was conducted for the subject site and location. A copy of the environmental database search is provided in Attachment 13. The results of the agency database review are presented below.

4.1.1 Hazardous Materials Management Division Database (CA HMMD)

The Hazardous Materials Management Division Database (CA HMMD) is a database that stores information on hazardous materials including business name, site address, phone number, establishment permit number, type of permit, and business status. The database also provides information on inspection dates, violations, hazardous waste generation, quantities, methods of storage, treatment/disposal of waste, and information on underground storage tanks. The database provides summaries of environmental contamination cases in San Diego, including underground tank cases, non-tank cases, groundwater contamination and soil contamination.

The database reported that a business plan for the GSA San Ysidro Border Station was accepted on March 9, 1999. A hazardous material inventory of 1500 gallons of amber fuel exists at the facility. A 10000-gallon underground storage tank was installed at the facility in 1971 and was closed by removal. The facility has several violations on file including: not amending the business plan in 1996, for not amending the business plan in 1999, not properly labeling hazardous waste containers, not keeping containers closed and inadequate personnel training records in 2001.

4.1.2 CA HIST UST

The CA HIST UST database is a local database that contains information pertaining to underground storage tanks. An underground storage tank was found for the San Diego Border Station located at 720 East San Ysidro Boulevard. The database reported that a 10000-gallon diesel underground storage tank was installed at the San Ysidro Border Station in 1972.

4.1.3 Hazardous Waste Information System (CA HAZNET)

The California Environmental Protection Agency's Hazardous Waste Information System database (CA HAZNET) extracts data from hazardous waste manifests received each year by the Department of Toxic Substance and Control.

The CA HAZNET database reported that United States Border Station/San Ysidro at 720 East San Ysidro Blvd. disposed of asbestos containing waste and hydrocarbon solvents with the EPA ID #CAC000907952. Please refer Section 3.6 Hazardous Waste for a detailed description of hazardous waste manifests.

4.2 State and Local Records

This section presents the results of state and local agency records review conducted for the San Ysidro Port of Entry Main Building at 720 East San Ysidro Boulevard. The following agencies were contacted for facility records review: Department of Toxic Substances Control, San Diego Air Pollution Control District, the California Integrated Waste Management Board, the State Water Resources Control Board San Diego Region, the Environmental Protection Agency Region IX and County of San Diego Department of Environmental Health. Copies of written correspondence are provided in Attachment 14.

4.2.1 Department of Toxic Substances Control

The Department of Toxic Substances Control (DTSC) was contacted on March 7, 2002 for information pertaining to the management of hazardous wastes. According to Julie Johnson of DTSC, records regarding the site/facility were not found during their search.

However, the facility has been issued hazardous waste EPA ID numbers by the DTSC for the disposal of hazardous waste as described in Section 3.6 Hazardous Waste.

4.2.2 San Diego Air Pollution Control District

The San Diego Air Pollution Control District (APCD) was contacted on March 8, 2002 for information regarding 720 East San Ysidro Boulevard.

According to Michelle Marasigan, a Notice of Violation was issued on August 23, 2001 to 720 San Ysidro Blvd. for failure to complete and return an emissions inventory report form. The facility was fined on October 18, 2001.

4.2.3 California Integrated Waste Management Board

The California Integrated Waste Management Board (CIWMB) was contacted on March 7, 2002 to obtain information about non-hazardous (solid) waste facilities. The CIWMB maintains records on solid waste facilities in discrete permit files. According to Dona Sturgess of CIWMB, information regarding the entity name and address was not found.

4.2.4 State Water Resources Control Board, San Diego Region

The State Water Resources Control Board, San Diego Region (RWQCB), was contacted on March 8, 2002 to request a search of their files for information associated with the San Ysidro Border Station located at 720 East San Ysidro Boulevard, San Ysidro, California. According to Michael Gallina of RWQCB, information regarding the property was not found during the file

search.

4.2.5 United States Environmental Protection Agency, Region IX

The United States Environmental Protection Agency (EPA) was contacted on March 8, 2002 for information in the Resource Conservation and Recovery Act (RCRA) and Comprehensive Environmental Response Compensation and Liability Act (CERCLIS) databases. The RCRA database lists those regulated facilities that have notified EPA as hazardous waste generators, transporters or treatment, storage or disposal facilities under RCRA. No requested information was found in the EPA Region IX RCRA database or hardcopy files. The CERCLIS database tracks activities for potential hazardous waste sites under its SUPERFUND program. Information on the site was not found in EPA Region 9 CERCLIS database or hardcopy files.

4.2.6 County of San Diego Department of Environmental Health

The County of County of San Diego Department of Environmental Health was contacted on March 15, 2002 to request information regarding environmental health and the hazardous waste records. The hazardous waste records searched the hazardous waste generator files, underground storage tank files, leaking underground storage tank cleanup, solid waste facility files, hazardous waste spill response logs, hazardous waste underground storage tank and infectious waste investigation and proposition 65 reports.

The file review provided information regarding underground storage tank integrity testing reports, underground storage tank inspection checklists, an underground storage tank operating permit application, soil sampling results, underground storage tank repair documentation and communication records for the facility.

A closure report was also found for the removal of a 10,000-gallon underground storage tank. The Site Assessment and Mitigation Division determined that no further action was required and an *Underground Storage Tank System Closure Report* was issued to the facility on May 23, 1996.

Information regarding compliance inspection reports and violations were also found for the facility. Descriptions of violations and dates of inspections can be found in the table below.

COMPLIANCE INSPECTION REPORTS

DATE	VIOLATION
February 5, 2001	Waste container missing/improperly labeled Waste container not kept closed Training records unavailable
February 3, 1999	Business plan not amended
December 16, 1996	Business plan not amended
January 11, 1996	Business plan not amended Annual integrity test not conducted
December 29, 1994	Business plan not amended Monitoring reconciliation not done properly
June 5, 1990	Business plan not completed and maintained on site

5.0 SUMMARY OF FINDINGS

An Environmental Compliance Audit has been conducted at the San Ysidro Port of Entry Main Building located at 720 East San Ysidro Boulevard, San Ysidro, California. This Environmental Compliance Audit was performed in substantial conformance with the scope and limitations of GSA's *Environmental Audit Statement of Work.* A detailed discussion of observations and data review has been presented in the previous sections. In summary, the following items regarding the subject facility were noted.

1. A Cummins Model VT12-635-GS emergency generator is located on the roof of the East Mechanical Building. A *Certificate of Registration* for the operation of the emergency generator was provided by the facility. According to the Property Manager, the emergency generator will be removed from service and replaced by a larger unit.

2. A 120-gallon day tank located on the roof of the East Mechanical Building supplies diesel fuel to the emergency generator. Minimum staining was observed at the pipe connections of the day tank.

3. Three natural gas fueled, Raypak heating hot water boilers are located in the Boiler Room of the East Mechanical Building. According to the Property Manager, the boilers are exempt from San Diego Air Pollution Control District permitting requirements.

4. Chemicals are added by an automatic injection system to the water supplied to the cooling tower. Labels were not affixed to the chemical containers.

5. The facility submitted a Cooling Tower registration form to the Air Pollution Control District on October 22, 2001. A permit to operate was not present during the environmental compliance audit.

6. An Asbestos Facility Action Plan was developed using a preliminary asbestos survey and assessment of the building that was conducted in September 1987. Since the 1987 survey and assessment, asbestos abatement has been performed at the facility. The facility currently does not perform the procedures outlined in the Asbestos Action Plan.

7. Training records could not be provided during the environmental site visit. According to the Property Manager, training files are kept off-site at the Federal Building. The maintenance representative was questioned regarding formal asbestos training. He indicated that no asbestos or hazardous material training has been conducted during his employment with the maintenance contractor.

8. The Hazardous Material Business Plan maintained by the facility was last revised on January 3, 1999. The plan assigns the previous property manager and contractor no longer located at the facility as the personnel responsible to perform notification procedures. Spill response emergency procedures and employee training descriptions and frequency were not consistent with environmental compliance audit findings. Spill

response kits were not observed in any of the hazardous material storage areas and training records could not be provided during the site visit.

9. Hazardous materials at the San Ysidro Port of Entry Main Building are stored in the Boiler Room, Paint Storage Room, Maintenance Shop, Flammable Storage Cabinet and Janitorial Storage Cabinet. A current facility hazardous material inventory was not available during the site visit. Compressed gas cylinders stored in the Maintenance Shop were not properly secured. Unlabeled containers were observed in the landscaping flammable storage cabinet.

10. Material safety data sheets are located in the Property Manager's office, outside the Janitorial Storage Room and outside the Maintenance Shop. Material safety data sheets located in the Property Manager's office were dated from 1987 and 1997.

11. Fluorescent light bulbs are disposed of as solid waste. Used oil is collected at the facility and recycled at the local recycling center once a quarter.

12. A 10,000-gallon underground storage tank was removed from the facility in 1996. A closure report could not be provided during the environmental compliance audit.

6.0 RECOMMENDATIONS

Based on the findings of Section 5.0, the following actions are recommended for the facility.

1. The facility should notify the County of San Diego Air Pollution Control District when the emergency generator is removed from service. The facility should submit a permit to construct request prior to the installation of new equipment in accordance with County of San Diego Air Pollution Control District, Regulation II, Rule 10 (a).

2. Secondary spill containment should be provided for the 120-gallon day tank located on the roof of the East Mechanical Building.

3. The facility should request a written exempt status from the Air Pollution Control District for the operation of three boilers located at the facility. The exempt status letter should be maintained at the facility and placed in the certificate display cabinet located in the Boiler Room.

4. The facility should contact the Air Pollution Control District for status on the Cooling Tower permit application that was submitted 11 months ago. A copy of the permit to operate should be maintained at the facility and placed in the certificate display cabinet located in the Boiler Room.

5. The Asbestos Facility Action Plan should be revised to include current asbestos survey sampling results, areas of asbestos abatement and current air monitoring and employee training procedures.

6. Training at the facility should be conducted in accordance with federal, state and local requirements. The facility should maintain copies of training records on-site before submitting the records to the GSA Regional Office.

7. The Hazardous Material Business Plan should be revised and submitted to the County of San Diego Department of Environment Health in accordance with California Code of Regulations (CCR) Title 19, Division 2, Chapter 4, Section 2620-2734 and Health and Safety Code Chapter 6.95, Article 1, Sections 25500-25520. In accordance with the facility Hazardous Material Business Plan, spill response kits should be provided in hazardous materials storage areas and training records maintained at the facility.

8. In accordance with the California Code of Regulations (CCR), Title 8, Division 1, Chapter 4, the following is recommended for the management of hazardous materials:

   - An inventory of hazardous materials should be put together for the facility, including materials used by tenant agencies.

   - Compressed gas cylinders should be held securely in substantial racks or other rigid structures in a well-protected, well-ventilated area.

- Labels should be placed on the chemical containers located on the roof and unlabeled containers located in the landscaping flammable storage cabinet.

- It is recommended that the facility develop a procedure to update Material Safety Data Sheets on a periodic basis and/or as new products are introduced into the workplace. Hazardous materials no longer in use should be removed from the active MSDS binder and placed in a separate folder for previously used hazardous materials. Ensure that MSDSs are present for each chemical stored at the facility.

9. Fluorescent light bulbs at the facility should be recycled in accordance with GSA recycling policies. Used oil should be recycled using a facility EPA ID number and hazardous waste manifests in accordance with County of San Diego Department of Environmental Health oil waste disposal requirements.

10. The facility should maintain the Underground Storage Tank System Closure Report for the 10,000-gallon underground storage tank that was removed from the facility in 1996. The closure report can be found in Attachment 12.

7.0 REFERENCES

ASTM. December 2000. *Standard Practice for Environmental Regulatory Compliance Audits (E2107-00).* West Conshohocken, PA.

Environmental Data Resources, April 23, 2002. *EDR-AuditCheck Facility Report, Border Station New Main Building, 720 E San Ysidro Blvd., San Ysidro, CA 92173.*

GSA. April 2000. *Executive Order 13148. Greening the Government Through Leadership in Environmental Management.*

National ISO 9000 Support Group. Nov 1995. *ISO 14010. Environmental Auditing.*

United States Environmental Protection Agency, Office of Enforcement and Compliance Assurance (2261-A). December 1996. *Generic Protocol for Conducting Environmental Audits of Federal Facilities (EPA 300-B-96-012 A/B).*

CAL INC

FINAL
ENVIRONMENTAL COMPLIANCE AUDIT REPORT

SAN YSIDRO PORT OF ENTRY MAIN BUILDING
720 EAST SAN YSIDRO BOULEVARD
SAN YSIDRO, CALIFORNIA

CONTRACT NO. GS-09P-02-KSA-0036
AWARD NO. P-09-02-NQ-0001

PREPARED ON BEHALF OF:

GSA

GENERAL SERVICES ADMINISTRATION
REAL PROPERTY PROGRAMS DIV., 9PM
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SEPTEMBER 2002

JOB # 7744

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LIST OF ATTACHMENTS

ATTACHMENT 9

ASBESTOS SURVEY REPORTS

DALE

AN ASBESTOS FACILITY ACTION PLAN

BORDER STATION
720 EAST SAN YSIDRO
SAN DIEGO, CALIFORNIA

CA0588GG

PREPARED FOR
THE GENERAL SERVICES ADMINISTRATION

BY

INDUSTRIAL HEALTH INCORPORATED
640 EAST WILMINGTON AVENUE
SALT LAKE CITY, UTAH

DALE

DRAFT

AN ASBESTOS FACILITY ACTION PLAN
FOR THE
BORDER STATION
720 E. SAN YSIDRO
SAN DIEGO, CA
CA0588GG

PURPOSE AND SCOPE

The purpose of this plan is to describe in detail the steps and actions that the GSA facility asbestos control manager and other involved personnel are taking in controlling asbestos at the Border Station, 720 E. San Ysidro, San Diego, California, (Building Number CA0588GG).

The elements of this plan include:

1. Assessment
2. Education and Training
3. Special Operations and Maintenance Program
4. Periodic Air Monitoring
5. Visual Inspections
6. Medical Surveillance
7. Recordkeeping
8. Communication with Occupants
9. Respiratory Protection
10. Emergency Procedures
11. Disposal

ASSESSMENT

A preliminary asbestos survey and assessment of this building was performed in September of 1987. The report of that survey as well as reports of all previous assessment surveys are incorporated as a part of the Records Section of this action plan.

As discussed below, a more comprehensive assessment should be performed to adequately determine a proper course of action for managing ACM in this building. To perform a thorough assessment it will be necessary to accurately map the location of surfacing materials, both exposed acoustical materials and fireproofing materials, throughout the facility, and to obtain additional bulk sampling data on these materials.

Asbestos containing materials are present in the following locations in this building:

Surfacing Materials

1. Sprayed-on acoustical ceiling materials are present throughout much of the building, and damage is apparent in many locations. Samples of acoustical materials collected in previous building surveys have consistently been identified as ACM (1- 20% chrysotile asbestos). The material is extensive throughout areas open to public access and in much of the office space throughout the building. The material is 1 to 2 inches thick over metal lathe. The location of acoustical ACM is in the building is as follows:

Ground Floor:

- Pedestrian processing corridors and lobby and office spaces and corridors have acoustical ACM. The only exceptions in this area are the toilet areas, stairwells, and mechanical spaces. Areas having acoustical ACM total roughly 10,000 square feet.

Mezzanine:

-Ceilings in this area are bare concrete, with no evidence of ACM

Second Floor:

- Uniform on all ceilings except the Customs areas in the northwest quadrant of the second floor, where a drop-tile ceiling is present. Surface area of acoustical ACM on the second floor is in excess of 40,000 square feet.

2. Spray-on fireproofing is present on steel beams and decking in many areas of the building, and this material varies from 0 to 20% chrysotile asbestos. The asbestos content of this material may be due to the asbestos content of the fireproofing material itself and/or to overspray contamination of materials above the metal lathe/acoustical ceiling areas. Data from bulk sampling of fireproofing materials is limited and a need exists for more extensive sampling of these materials. The return air to the HVAC system is ducted, such that return air does not come in direct contact with ACM above the ceiling. Location of fireproofing ACM is as follows:

Ground Floor:

-Only one sample of fireproofing has been obtained in the pedestrian processing area of the ground floor, and this showed no asbestos. This single result is insufficient for concluding whether or not asbestos is present in the fireproofing in this area.

-"Soffit" area above primary vehicular inspection lanes. Fireproofing reportedly continuous over 50,000+ square foot area. Three samples range from 5 to 20% Chrysotile asbestos.

-East Secondary Vehicular Building: fireproofing is present on the two main steel beams, and this material is 15% chrysotile

-West Secondary Vehicular Building: fireproofing is present in the penthouse area and on two main support beams, but four bulk samples of the material showed no detectable asbestos.

Second Floor

-Fireproofing ACM ranging from 0-10% Chrysotile appears to be extensive over the entire area above the second floor. The surface area of this material is in excess of 50,000 square feet.

Pipe and Boiler Insulation

There is no clear-cut evidence of any asbestos-containing pipe or boiler insulation in the Border Station, though only a limited number of samples have been taken of these materials. (Asbestos containing pipe and boiler insulation is present in the Old Support Building, CA0581GG.)

Non-friable Materials

Non-friable asbestos containing materials have not been identified at the Border Station. A few bulk samples have been obtained of acoustical ceiling tile and vinyl floor tile and these have shown no detectable asbestos. No "Transite" has been found in the building. The possible presence of asbestos in fire doors has not been established.

ABATEMENT NEEDS

Acoustical ACM should be removed from the pedestrian processing lobby and from public access areas (INS Waiting Room and corridor leading from escalator to Waiting Room) as soon as possible. Minor to moderate damage is readily apparent in these areas, and the ACM is particulary accessible in the corridor leading to the INS waiting room where the ceiling is quite low.

Other areas of concern include the corridors near the elevators and custodial closets where damage has been caused by mop or broom handles hitting the ceiling. There are also areas of damage to the acoustical material in various locations in the second floor office spaces and corridors.

The fireproofing materials are fairly well contained and the presence of return air ducts helps to minimize fiber release to the building atmosphere. However, access to the above ceiling area is required from time to time, and the presence of the ACM in this area greatly hinders performance of necessary work and maintenance. The removal of this material is thus of lower priority than for the exposed and damaged acoustical material, and this action may be delayed. It should be born in mind, however, that fireproofing materials present above the acoustical materials should be removed at the same time the acoustical materials are removed. Removal of the acoustical materials would best be accomplished through wholesale removal of the suspended metal lathe ceiling. Once that is accomplished, the fireproofing would then be exposed and could be most easily removed at that time. New non-asbestos fireproofing and some type of suspended ceiling could then be installed. Considerable reworking of electrical and lighting systems will doubtless be required in these areas as part of the new ceiling installation.

Based upon the above estimates of the amount of acoustical ACM present in the building (roughly 50,000 square feet), and upon the estimate of roughly 120,000 square feet of fireproofing, removal costs for all friable asbestos containing material could range from $1.7 to $3.4 million dollars. This cost estimate does not include costs associated with relocation of public throughways, waiting rooms, and office personnel, nor with increased operating costs during the removal project, nor with replacement costs of fireproofing and ceilings.

EDUCATION & TRAINING

Building maintenance and custodial employees will receive formal training about the types and location of asbestos materials in the building along with the proper precautions to follow when involved with it. Respiratory protection, proper clean-up and disposal of asbestos debris and the use of personal protective clothing will be stressed in the training. The formal training will be completed through either use of the PBS Asbestos Control Program Training Course (August 1986), an EPA/State-approved or recognized University-sponsored asbestos training course, or specialized training provided by the contract Industrial Hygienist. The training must take place before employees are allowed to perform any asbestos related work.

OPERATIONS AND MAINTENANCE PROGRAM

Responsibilities:

1. The facility asbestos control manager is responsible for administering the operations and maintenance (O/M) program.

2. The supervisor of building maintenance and custodial staff are responsible for increasing cleaning and maintenance work and for implementing precautionary procedures to prevent disturbance of the ACM.

3. Trained safety and health professionals are responsible for monitoring ACM conditions and asbestos air levels.

The following table describes the specific work practices and controls to be followed when performing activities that involve contact with or potential exposure to asbestos containing materials. The type of ACM, its location in the building, the work activity involved and the controls required for performing the work are listed.

TABLE 1. Work Practice Controls for Asbestos-Related M&O Activities

Note: The abbreviations used in the "Controls Required" column have the following meanings:

AH--After hours and/or in unoccupied space
C/NA/GB--Containment with negative air/glovebag
R--Respiratory protection
PPE--Other personal protective equipment
HEPA--A vacuum cleaner equipped with a high efficiency air filter
y--Yes, required
n--No, not required

Type of ACM	Location	Activity	Controls Required				
			AH	C/NA/GB	R	PPE	HEPA
Sprayed-on fire proofing on beams and decking	All floors	Above ceiling inspection	y	y	y	y	y
		Above ceiling HVAC, elect'l plumbing, and carpentry work	y	y	y	y	y
		Installation of hangers	y	y	y	y	y
		Repair/removal of ≤ 1500 cu in	y	y	y	y	y
		Repair/removal of ≥ 1500 cu in	This activity must be done under contract per Section 02085 specifications				
		Core drilling from floor above through mat'l	y	y	y	y	y
		Cleanup of spills or debris in area above ceiling tiles	y	y	y	y	y
		Routine cleaning of floors, table tops, desks, cabinets, etc.	n	n	n	n	y

TABLE 1, Continued

Type of ACM	Location	Activity	Controls Required				
			AH	C/NA/GB	R	PPE	HEPA
Sprayed on acoustical material	Ceilings of portions of main bldg.	Installation of hangers	y	y (not a recommended procedure)	y	y	y
		Repair/removal of ≤ 1500 cu in	y	y	y	y	y
		Repair/removal of ≥ 1500 cu in	This activity must be done under contract per Section 02085 specifications				
		Cleanup of spills or debris	y	y	y	y	y
		Routine cleaning of floors, table tops, desks, cabinets, etc.	n	n	n	n	y
		Any repairs such as sawing, cutting, drilling, etc., that disturbs ACM	y	y	y	y	y
Composite fire doors (wood or metal)	(if found)	Removing/ replacing hardware	y	n	y	y	y
		Alteration/ repair of door	y	y	y	y	y
		Disposal	y	n	n	n	n

Included as an appendix to this action plan are Standard Operating Procedures which provide detailed guidance in the following activities:

1. Standard Operating Procedure #1--Custodial Work

2. Standard Operating Procedure #2--Carpet Removal

3. Standard Operating Procedure #3--Removal of Permanent Sheetrock and Plaster Walls; Below Ceiling

4. Standard Operating Procedure #4--Work Above Ceiling Tiles, Large Area No Intentional Disturbance of Intact Asbestos Insulation

5. Standard Operating Procedure #5--Work Above Ceiling Tiles, Small Area No Intentional Disturbance of Intact Asbestos Insulation

6. Standard Operating Procedure #6--Work Above Ceiling Tiles That Includes Intentional Disturbance of Very Small Amount of Intact Asbestos Insulation

PERIODIC AIR MONITORING

Air sampling to determine asbestos fiber concentrations in air is provided by the 9PM-12 Industrial Hygiene contractor. On the basis of the assessment number assigned to the high priority areas of the Border Station (the algorithm score for areas where acoustic material is damaged and accessible is 66-72), air sampling must be performed on a quarterly basis. This sampling schedule is in accordance with the requirements of PBS P 5900.2B CHGE 2, September 5, 1986. This schedule should be adhered to until such time as the ACM in these areas is removed. Thereafter, air sampling for the remainder of the building will be conducted as necessary based on the results of the comprehensive building survey. The most recent air sampling was performed on 9/1/87. The following quarterly sampling schedule for the next three years has been established:

Sampling Completion Date

			12/1/87
3/1/88	6/1/88	9/1/88	12/1/88
3/1/89	6/1/89	9/1/89	12/1/89
3/1/90	6/1/90	9/1/90	12/1/90

Air samples are collected and analyzed in acordance with NIOSH sampling and analytical method 7400 B. All samples will be analyzed by laboratories that are accredited by the American Industrial Hygiene Association and that are participants in the Proficiency Analytical Testing (PAT) program.

Results of all air sampling will be kept in this Action Plan File.

VISUAL INSPECTIONS

Visual inspections of the ACM will be conducted on a quarterly basis by the industrial hygienists at the time of air samping. Additional monthly visual inspections will be performed by the facility asbestos control manager.

Custodial and maintenance staff will inform the facility asbestos control manager when damage to ACM is observed.

Reports of visual inspections are incorporated as a part of the action plan.

MEDICAL SURVEILLANCE

GSA employees who perform asbestos-related work are provided periodic medical examinations in accordance with 29 CFR 1910.1001 and 29 CFR 1926.58. Present information indicates that the following individuals have been included in the medical surveillance program:

Bergen, Dale A.
Hartwell, Oscar
Moya, Claude
VanSingle, Charles
Estebar, Rosendo
Hortizuela, George A.
Partolan, Salvador R.

RECORDKEEPING

The following records are incorporated into this facility asbestos action plan as permanent files:

1. Survey/assessment reports
    a. All existing bulk sampling data available through Mr. Dale Bergen at the Border Station have been compiled and are included in Table 2. Date, location, identity of sampler and

analytical labs, and sampling results are included in the table.

2. Periodic air monitoring results.

COMMUNICATION WITH OCCUPANTS

The key to effective control of asbestos in the Border Station is active and ongoing communication with the building's occupants. Tenant agencies must be informed of the presence of asbestos in their respective spaces and any special requirements regarding cleaning, maintenance or alterations of their areas.

Communications with building occupants will be accomplished via several mechanisms:

1. The facility asbestos control manager is responsible for apprising all tenant agencies of asbestos related activities. This will be accomplished via a building asbestos committee and by other means listed below. The committee will be comprised of GSA representatives and a representative from each tenant agency. The committee will meet on a regular basis and as needed to assure that occupant agencies are kept informed of the responsibilities and actions of their employees and contractors in complying with asbestos standards and the provisions of this Asbestos Facility Action Plan and to assure that their concerns, anxieties, and complaints are dealt with in a timely fashion. Items to be discussed include:

   a. Notice of abatement/alteration action: Two weeks prior to the start of an abatement or alteration project that will involve asbestos, all affected agencies will be informed via direct communication with the occupant agency liaison person, posted notice or both.

   b. Notification of air monitoring levels: Agencies will be notified of the results of periodic air monitoring conducted in the building. Appropriate guidance will be provided in the event that fiber concentrations exceed the OSHA action level of 0.1 fibers/cc.

c. Posting of notices: The attached notices will be used to inform occupants and visitors of the presence of ACM and to notify of any abatement work planned and underway.

RESPIRATORY PROTECTION

The respiratory protection program for GSA employees who are potentially exposed to asbestos shall conform to the requirements of 29 CFR 1910.134 and 29 CFR 1926.58. The facility asbestos control manager, with assistance from the industrial hygiene contractor, will develop a formal respiratory control program with the following elements:

1. Written standard operating procedures governing the selection and use of respirators.

2. Selection of respirators based on guidelines in 29CFR1926.58.

3. Training of users on the proper use of the selected respirators.

4. Fit testing in accordance with procedures prescribed in 29CFR1926.58.

5. Inspection, cleaning and disinfection procedures.

6. Proper storage procedures.

The following GSA employees have been assigned to use either a powered air purifying or a half-face negative pressure respirator. Those whose names are followed by an asterix have been examined by a qualified physician who has certified that the employee can function normally while wearing a respirator.

Maintenance and Operations

Bergen, Dale*
Estebar, Rosendo*
Partolan, Sal*
VanSingle, Charles

Custodial

Hortizuela, George A.*
Power, Norm
Robinson, Joseph

EMERGENCY PROCEDURES

A written plan will be prepared to provide emergency controls of asbestos in the event of such conditions as severe and sudden water damage, earthquake or other event that causes ACM to be disturbed and released into the building atmosphere. The emergency plan is to be a part of the Occupant Emergency Plan which will be incorporated as a part of this action plan.

DISPOSAL

All waste material containing asbestos will be sealed in impervious containers, properly labeled and disposed in accordance with EPA, State and local regulations at approved disposal facilities. Records, transportation manifests, and other related documents are incorporated as a part of this action plan.

Examples of wastes included in this requirement are:

1. Used HEPA vacuum filters
2. Used respirator cartridges
3. Used HVAC filters
4. Used overalls and other disposable personal protective equipment
5. Debris from removal or cleanup activities.

TABLE 2. Summary of Asbestos Bulk Sampling at San Diego Border Station

Location	Sample by	Date	Lab	Asbestos % and Type
Acoustical Ceiling Material				
Room 2239	GSA	1/86	F.F.	5-10% Chrysotile
Room 2140	"	"	"	3-5% Chrysotile
Room 2210	GSA	12/86	SAI	1% Chrysotile
Room 2229	"	"	"	10% Chrysotile
Room 2200	"	"	"	2% Chrysotile
Room 2103, DEA	"	"	"	1% Chrysotile
INS Escalator Corridor	"	"	"	10% Chrysotile
INS Corridor (low ceiling)	IHI	12/85	UBTL	2-3% Chrysotile
Room 2213, INS	GSA	10/85	SAI	5% Chrysotile
Room 2210, INS	"	"	"	5% Chrysotile
Room 2201	"	"	"	10% Chrysotile
Room 2225, AG	"	"	"	5% Chrysotile
Passageway to Info Booth	"	"	"	20% Chrysotile
Room 1004	"	"	"	5% Chrysotile
Room 2002, Customs	"	"	"	ND
Room 2002, Customs exer. rm.	IHI	12/85	UBTL	5-10% Chrysotile
INS Waiting Room near windows	GSA	10/85	SAI	5% Chrysotile
INS Waiting Room, ceiling	IHI	12/85	UBTL	2-3% Chrysotile
Room 2229, Agriculture	"	"	"	5% Chrysotile
Outdoor walkway ceiling material	"	"	"	ND
Fireproofing				
Room 2141, above ceiling	GSA	1/86	F.F.	5-10% Chrysotile
Room 2143, above ceiling	IHI	12/85	UBTL	1-2% Chrysotile
Room 2213, INS, above ceiling	GSA	10/85	SAI	5% Chrysotile
Room 2120, INS, above ceiling	"	"	"	10% Chrysotile
Room 1009, men's toilet, abv ceil.	"	"	"	ND
Room 2019, men's locker	"	"	"	ND
Soffit Area, above Lane 8	"	"	"	5% Chrysotile

TABLE 2. Continued

Location	Sample by	Date	Lab	Asbestos % and Type
Fireproofing, continued				
Soffit Area, above Lane 13	"	"	"	5% Chrysotile
Soffit Area, above Lane 19	"	"	"	20% Chrysotile
West Vehicular, room 1417	"	"	"	ND
West Vehicular, Penthouse #4 1st level landing	IHI	9/87	Dixon	ND
West Vehicular, Penthouse #4 ceiling beneath roof	"	"	"	ND
West Vehicular, steel beam above room 1426	"	"	"	ND
West Vehicular, steel beam above room 1403	"	"	"	ND
East Vehicular, steel beam above room 1210	"	"	"	15% Chrysotile
East Vehicular, steel beam above room 1202	"	"	"	15% Chrysotile
Pipe and Boiler Insulation				
East Vehicular, pipe elbow in pipe chase near rm 1221	IHI	9/87	Dixon	ND
Boiler Room, Stack insulation	?	2/81	?	ND
Non-Friable Materials				
Floor Tile, from storage, same as tile in building	IHI	9/87	Dixon	ND
Ceiling Tile, smooth surface, West Vehicular	"	"	"	ND
Ceiling Tile, rough surface, West Vehicular	"	"	"	ND

Removed 2 site plan drawings (2 pages of this report) per pursuant to exemption 7(F), law enforcement information.

THE SZABAS COMPANIES

July 17, 1998

TSC Project No.:2232

Manual Gomez
Westpac Controls
Post Office Box 460786
Escondido, CA 92046

RE: Air Clearance Sampling at: 801 East San Ysidro Boulevard

Dear Mr. Gomez:

On July 10, 1998, TSC's Site Surveillance Technician collected clearance samples subsequent to the abatement project at the referenced property. Samples were collected and analyzed to determine the airborne concentration of fibers.

Samples were collected using high flow vacuum pumps calibrated before and after the sampling period to a flow rate of 10 liters per minute. Collection media consisted of 25 millimeter, 0.8 μ mixed cellulose membrane filters in 3-piece cassettes with extension cowls. Analysis of the samples was conducted using Transmission Electron Microscopy (TEM). Results are reported in fibers per cubic centimeter (s/mm^2) of air. TEM analysis is specific for asbestos fibers.

RESULTS

Sample ID#	Area	Volume (liters)	Results (s/mm^2)
071098C-1	Main Bldg, 1st Floor Electrical room	1210	< 14.6
071098C-2	Main Bldg, 1st Floor, east end Hallway outside electrical rm	1200	< 14.6
071098C-3	Main Bldg, 1st Floor Fish bowl area/lunch room	1210	< 14.6

Should you have any further questions, please do not hesitate to call.

Prepared by:

(b)(6) [redacted]

Drew Cornelison
Certified Asbestos Consultant
#97-2273

Design For Health, Inc.

3574 Kettner Blvd.
San Diego, CA 92101
(619) 291-1777
Fax (619) 291-4318

BULK SAMPLE ANALYSIS REPORT

CLIENT: General Services Administration
801 E. San Ysidro Blvd.
San Diego, CA 92173

ANALYSIS: One bulk sample submitted for analysis of asbestos material.

ANALYTICAL METHODOLOGY: Polarized Light Microscopy/Dispersion Staining
EPA Method 600/M4-82-020

********** RESULTS **********

SAN YSIDRO BORDER
720 E. SAN YSIDRO BLVD.
June 13, 1997

Lab Date	Lab I.D.	Sample Description	Asbestos Type	% by Volume
6/13/97	134720	Beige insulation Boiler room Sample #1	Chrysotile Amosite Cellulose Glass Fibers Matrix	50-60% 5-10% 3-5% 10-15% Filler

STACK GASKET

Trace = Less than 1% is present. ND = No asbestos detected, method of limit detection is 1%. Results are based upon samples submitted for analysis only.

Asbestos includes chrysotile, amosite, crocidolite, anthophylite, tremolite and actinolite. This analytical report relates only to the samples tested. It may not be used by the client to claim product endorsement by NVLAP or by any agency of the U.S. Government.

NOTE: Tile, vinyl, foam, plastic and fine powder samples may contain asbestos fibers of such small dimensions that fibers may not be detected by PLM. If greater certainty is required, more sensitive analytical methods such as X-Ray Diffraction, Transmission Electron Microscopy and Scanning Electron Microscopy are recommended.

This report shall not be reproduced except in full, and then only with the written approval of the DFH Laboratory.

Design For Health, Inc. appreciates the opportunity to provide these services.

Sincerely,

(b)(6) [redacted]

Kabir Shefa
Director of Technical Services

Design For Health, Inc.

1516 W. Redwood, Suite 104
San Diego, CA 92101
(619) 291-1777

BULK SAMPLE ANALYSIS REPORT

CLIENT: General Services Administration
801 E. San Ysidro Blvd.
San Ysidro. CA 92173
Attn: Thomas Carson

ANALYSIS: Five bulk samples collected for analysis of asbestos material.

ANALYTICAL METHODOLOGY: Polarized Light Microscopy/Dispersion Staining
EPA Method 600/M4-82-020

********** RESULTS **********

SAN YSIDRO BORDER STATION
801 E. SAN YSIDRO BLVD., SAN YSIDRO
February 19, 1997

Lab Date	Lab I.D.	Sample Description	Asbestos Type	% by Volume
2/19/97	130079	Grey-fireproofing Soffit-D/N Sample #1	Chrysotile Cellulose Matrix	10-20% 2-3% Filler
2/19/97	130080	Grey-fireproofing Soffit-E/N Sample #2	Chrysotile Cellulose Matrix	10-15% 2-3% Filler
2/19/97	130081	Grey-fireproofing Soffit-F/N Sample #3	Chrysotile Cellulose Matrix	15-20% 3-5% Filler
2/19/97	130082	Grey-fireproofing Soffit-G/N Sample #4	Chrysotile Cellulose Matrix	20-25% 3-5% Filler
2/19/97	130083	Grey-fireproofing Soffit-B/S Sample #5	Chrysotile Cellulose Matrix	10-20% 2-3% Filler

Trace = Less than 1% is present. ND = No asbestos detected, method of limit detection is 1%. Results are based upon samples submitted for analysis only.

Asbestos includes chrysotile, amosite, crocidolite, anthophylite, tremolite and actinolite. This analytical report relates only to the samples tested. It may not be used by the client to claim product endorsement by NVLAP or by any agency of the U.S. Government.

NOTE: Tile, vinyl, foam, plastic and fine powder samples may contain asbestos fibers of such small dimensions that fibers may not be detected by PLM. If greater certainty is required, more sensitive analytical methods such as X-Ray Diffraction, Transmission Electron Microscopy and Scanning Electron Microscopy are recommended.

This report shall not be reproduced except in full, and then only with the written approval of the DFH Laboratory.

Design For Health, Inc. appreciates the opportunity to provide these services.

Sincerely,

(b)(6) [redacted]

Kabir Shefa
Director of Technical Services

Health & Safety Services, Inc.

9446 MIRAMAR RD., SUITE C, SAN DIEGO, CALIFORNIA 92126 (619) 689-2526

AIR MONITORING FOR THE PRESENTS OF

AIRBORNE FIBERS

On March 12, 1991 air monitoring for the presents of airborne fibers was conducted at the San Ysidro Border Station, 710 San Ysidro Boulevard, San Ysidro, California.

Mr Dale Bergen, Maintenance and Operations Foreman, requested the sampling, per purchase order number 588 DB 280. Mr. Bergen, identified the locations and verified the work.

The purpose of the sampling was to determine the concentration of airborne fibers in various areas during normal use. Air samples were collected from five locations. A building occupant unplugged the sixth pump. All samples were collected on 25mm diameter cassettes which contained 0.8um filters.

Enclosed you will find the laboratory results. All air sample results meet or exceed the Environmental Protection Agency requirements of 0.01 fibers per cubic centimeter for reoccupancy following abatement work. Based upon the results, at the time of sampling, there was minimal risk to the building occupants.

If we can be of any further assistance or if you have any questions, please feel free to call us.

Sincerely,

(b)(6) [redacted]

John Niebuhr
President

Health & Safety Services, Inc.

9446 MIRAMAR RD., SUITE C, SAN DIEGO, CALIFORNIA 92126 (619) 689-2526

AIR SAMPLE ANALYSIS REPORT

CLIENT # GSA/SAN YSIDRO
DATE COLLECTED: 3-12-91

H&SS PROJECT # 1080
DATE LOGGED: 3-13-91

PURPOSE:
The purpose of the analysis was to determine the concentration of airborne fibers.

PROCEDURE:
Air samples were analyzed in accordance with NIOSH (National Institute for Occupational Safety and Health) #7400 Method requirements.

SAMPLE TYPE: 1-BACKGROUND; 2-CONTAMINATION; 3-COMPLIANCE
4-REOCCUPANCY; 5-BLANK; 6-PERSONAL

Sample Type	Sample I.D.	Volume (liters)	Fiber Con. f/cc	Employee or Location
1	SY-1	1397	.007	CORRIDOR BY WATERFOUNTAIN
1	SY-2	1352	.009	ROOM 2132
1	SY-3	1320	.002	ROOM 2103
1	SY-4	1320	.008	ROOM 2202 A
1	SY-5	1320	.007	INS STAIRWELL
1	SY-6	1320	.008	ROOM 1237
5	SY-7	0000	<.01	FIELD BLANK
5	SY-8	0000	<.01	FIELD BLANK

COMMENTS: All samples analyzed meet or exceed EPA requirements.

Health and Safety Services, Inc., appreciates the opportunity to have served you.

Prepared by (b)(6) illegible signature
Microscopist

(b)(6) illegible signature
Supervisor

HEALTH AND SAFETY SERVICES, INC.
P.O. BOX 4585, OCEANSIDE, CA. 92052-4585
(619) 967-0122

689252.6 JOHN

REPORT OF RESULTS

DATE RECEIVED:12/27/90
DATE COLLECTED:12/27/90

CLIENT: GSA
DATE LOGGED:12/27/90

REPORT NO.:90-12-003

SUBJECT: AIRBORNE ANALYSIS

PURPOSE:
The purpose of the analysis was to determine the concentration of airborne fibers.

PROCEDURE:
Air samples were analyzed in accordance with NIOSH (National Institute for Occupational Safety and Health) #7400 Method.

SAMPLE TYPE: 1-BACKGROUND; 2-CONTAMINATION; 3-COMPLIANCE
4-REOCCUPANCY; 5-BLANK; 6-PERSONAL

Sample Type	Sample I.D.	Volume (liters)	Fiber Con. f/cc	Employee or Location
1	SY 1	1520	.001	ROOM 2103
1	SY 2	1530	.0008	ROOM 2132
1	SY 3	1510	.005	HALLWAY BY ROOM 2009
1	SY 4	1490	.002	ROOM 2202 A
1	SY 5	1450	.005	INS STAIRWELL
1	SY 6	1470	.006	ROOM 1237
5	SY 7	0000	<.01	30 SEC BLANK
5	SY 8	0000	<.01	BLANK

$324.00

588DB171 6/28/90

619

John 960122

certified invoice 903202
7/20/90 $324.00

HEALTH AND SAFETY SERVICES, INC.
P. O. BOX 4585
OCEANSIDE, CALIFORNIA 92052
(619) 967-0122

AIR MONITORING FOR THE PRESENTS OF

AIRBORNE FIBERS

On June 28, 1990, air monitoring for the presents of airborne fibers was conducted at the San Ysidro Border Station, 710 San Ysidro Boulevard, San Ysidro, California.

Mr Charles Fergerson, San Diego Field Office, requested the sampling, per purchase order number 588DB171. Mr. Dale Bergen, Maintenance and Operations Foreman identified the locations and verified the work.

The purpose of the sampling was to determine the concentration of airborne fibers in various areas during normal use. Air samples were collected from five locations. A building occupant unplugged the sixth pump. All samples were collected on 25mm diameter cassettes which contained 0.8um filters.

Enclosed you will find the laboratory results. All air sample results meet or exceed the Environmental Protection Agency requirements of 0.01 fibers per cubic centimeter for reoccupancy following abatement work. Based upon the results, at the time of sampling, there was minimal risk to the building occupants.

If we can be of any further assistance or if you have any questions, please feel free to call us.

Sincerely,

(b)(6) [redacted]

John Niebuhr
President

EssTek
An ESS Company
EssTek 9041-17 Dice Rd Santa Fe Springs, CA 90670 (213) 944-2520

AIR SAMPLE ANALYSIS REPORT

CLIENT: HEALTH & SAFETY SERVICES
P.O. BOX 4585
OCEANSIDE, CA 92054

REPORT #: 37- 70007
REPORT DATE: 07-05-90

PROJECT: NONE GIVEN

DATE RECEIVED: 06-29-90
PO #: None Given

CLIENT SAMPLE ID	ESS ID	SAMPLE DATE	SAMPLE VOL (L)	FIBER COUNT	FIELD COUNT	BLANK CNT /100 FLDS	FIBERS PER CC *	BKGRND MAT **
SY-1	70007	06-28-90	1584	1.0	100	0.00	< 0.003	T
SY-2	70008	06-28-90	1548	3.0	100	0.00	< 0.003	T
SY-3	70009	06-28-90	1560	15.0	100	0.00	0.005	L
SY-5	70010	06-28-90	1440	8.0	100	0.00	< 0.003	VL
SY-6	70011	06-28-90	1500	4.0	100	0.00	< 0.003	T
SY-7	70012	06-28-90	0	0.0	100	N/A	BLANK	
SY-8	70013	06-28-90	0	0.0	100	N/A	BLANK	

SAMPLE LOCATIONS:

Sample #70007 was a background sample taken by room #2132. Pump #1408 was run for 132 min. and calibrated at 12.0 lpm.

Sample #70008 was a background sample taken by room #2103. Pump #1462 was run for 129 min. and calibrated at 12.0 lpm.

Sample #70009 was a background sample taken by ins. stairwell. Pump #1440 was run for 130 min. and calibrated at 12.0 lpm.

Sample #70010 was a background sample taken by room #1237. This sample could not be read due to an unpluged pump.

Sample #70011 was a background sample taken in the hallway by room #2009. Pump #1444 was run for 125 min. and calibrated at 12.0 lpm.

AIR SAMPLE ANALYSIS REPORT

CLIENT: HEALTH & SAFETY SERVICES
PROJECT: NONE GIVEN

SAMPLE LOCATIONS (continued):

Sample #70012 was a blank sample.

Sample #70013 was a blank sample.

The samples analyzed in this report were provided by third parties not subject to control by Environmental Safety Systems, Inc. (ESS) or its affiliates. Consequently, the results presented represent microscopic examinations in ESS laboratory facilities and ESS makes no representation as to sample collection techniques or procedures.

Analysis was performed using phase contrast microscopy under the guidelines of NIOSH method #7400-A.

* A minimum of ten fibers per 100 fields is needed for reliable quantification. Samples with less than 10 fibers per 100 fields are reported as less than (<) the quantification limit.

** Amounts of non-fibrous material are determined using charts for estimating composition from the Journal of Sedimentary Petrology (v. 25, pp. 229-234, 1955). Amounts reported reflect non-fibrous material density on sample filter only.

Legend: T = Trace (less than 1%), VL = Very Low (2-5%), L = Low (5-15%), M = Moderate (15-25%), H = High (25-40%), VH = Very High (greater than 40%).

Microscope Field Area = 0.00785 mm^2

Analyst(s) - DM

Exposed Filter Area = 385.0 mm^2

Reviewed by: (b)(6) illegible

HEALTH AND SAFETY SERVICES, INC
P.O. BOX 4585
OCEANSIDE, CA. 92054

ASBESTOS CONSULTATIONS

A.H.E.R.A. CERTIFIED

CHAIN OF CUSTODY RECORD

Project No. [redacted]

Laboratory ESSTEK

Date Received: 6-29-90

Time Received: _____

Number of Samples: 7

Type of Samples: AIR

Sample No. 541-8

Requested Turnaround Time:

a. Rush (same day)
b. 24 hours
(c) 48 hours
d. 3-5 days
e. 1 week

Person to contact with results: (b)(6) illegible signature

Address: Same as above

Phone No. 619-591-2032 - enter your no and with a "#" sign

Relinquished by: (b)(6) illegible signature

Received by: (b)(6) illegible signature

Date: 6-29-90

Time: 2200

Relinquished by: _____

Received by: _____

Date: _____

Time: _____

Relinquished by: _____

Received by: _____

Date: _____

Time: _____

ALTH AND SAFETY SERVICES, INC.
O. BOX 4585 OCEANSIDE, CALIFORNIA 92054
(619) 967-0122

AIR/BULK SAMPLE DATA SHEET

JOB # [redacted]

TECHNICIAN (b)(6) illegible signature

DATE COLL. 6-28-90

CALB. DATE 6-28-90

	SAMPLE ID #	SAMPLE LOCATION	TYPE	PUMP #	TIME ON/OFF	FLOW RATE	TOTAL VOLUME	MATERL TYPE
570007	SY-1	Rm 2132	1	1408	1253/1505	12	1584	
8	SY-2	Rm 2103	1	1462	1258/1507	12	1548	
9	SY-3	INS. STAIRWELL	1	1440	1300/1510	12	1560	
X	SY-4	Rm 2202A	1	1426	1307/	VOID - UNPLUGGED	OCCUPANTS PUMP	
10	SY-5	Rm 1237	1	1455	1315/1515	12	1440	
11	SY-6	HALLWAY BY RM 2009	1	1444	1325/1530	12	1500	
12	SY-7	30 SEC. BLANK	5		/			
13	SY-8	BLANK	5		/			
					/			
					/			
					/			
					/			

SAMPLE TYPE KEY

1. Background
2. Contamination
3. Compliance
4. Reoccupancy
5. Blank
6. Personal
7. Bulk

Attachment 7

Facility Asbestos Action Plan

FACILITY ASBESTOS ACTION PLAN
FOR ASBESTOS CONTAINING MATERIALS
AT THE SAN YSIDRO BORDER CROSSING
BUILDING CA0588
720 E. SAN YSIDRO
SAN DIEGO, CA 92115

***Prepared For*:**

GENERAL SERVICES ADMINISTRATION, REGION 9
SAFETY AND ENVIRONMENTAL BRANCH
450 GOLDEN GATE AVENUE, 4TH FLOOR EAST
SAN FRANCISCO, CA 94102

***Prepared By*:**

SCA
ENVIRONMENTAL, INC.

334 19TH STREET
OAKLAND, CA 94612
tel: (510) 645-6200
fax: (510) 839-6200

GSA Contract No.: GS-09P-07-NQ-M-0023

SCA Project No.: G-8452

JUNE 2007

FACILITY ASBESTOS ACTION PLAN
FOR ASBESTOS CONTAINING MATERIALS
AT THE SAN YSIDRO BORDER CROSSING
BUILDING CA0588
720 E. SAN YSIDRO
SAN DIEGO, CA 92115

PREPARED FOR

GENERAL SERVICES ADMINISTRATION, REGION 9
SAFETY AND ENVIRONMENTAL HEALTH BRANCH
450 GOLDEN GATE AVENUE, 4TH FLOOR, EAST
SAN FRANCISCO, CA 94102

JUNE 2007

SCA PROJECT NO. G-8452

SCA ENVIRONMENTAL, INC.
334 19TH STREET
OAKLAND, CA 94612
TEL: (510) 645-6200
FAX: (510) 839-6200

TABLE OF CONTENTS

Appendices:

A. Assessment Results
B. Renovation and Demolition Activities Records
C. Records of Contracted Abatement Work
D. Medical surveillance Records
E. Respiratory protection Program Records
F. Fit-testing Records
G. Training Records
H. Asbestos Waste Disposal Records and Landfill Receipts
I. FACM Contact Information

List of Common Acronyms and Abbreviations

AAA	= Assumed Asbestos-Containing Materials
ACM	= Asbestos-Containing Materials
AHERA	= Asbestos Hazard Emergency Response Act
CAC	= Certified Asbestos Consultant
Cal/OSHA	= the California Division of Industrial Safety and Health
Cal/EPA	= the California Environmental Protection Agency
CAULK	= window and door perimeter caulking
CCR	= California Code of Regulations
CERCLA	= Comprehensive Environmental Response, Compensation, and Liability Act
CFR	= Code of Federal Regulations
CHMM	= Certified Hazardous Materials Manager
CIH	= Certified Industrial Hygienist
CSST	= Certified Site Surveillance Technician
DOHS	= the California Department of Health Services
DS/PLM	= Polarized Light Microscopy with Dispersion Staining
EPA	= the U.S. Environmental Protection Agency
EXPJNT	= expansion joint
FLVCS	= linoleum flooring
FLVCT	= vinyl composite floor tiles
ft^2	= square feet
GROUT	= ceramic tile and concrete grouts
HA	= homogeneous areas
LF	= linear feet
NESHAP	= National Emission Standard for Hazardous Air Pollutants
OSHA	= the federal Occupational Safety and Health Administration
PCB	= Polychlorinated Biphenyl
PCM	= Phase Contrast Microscopy
PEL	= Permissible Exposure Level
Penta	= Pentachlorophenol
PISTM	= steam thermal system pipe insulation
ppm	= parts per million
PUTTY	= window pane puttyy
QA/QC	= Quality Assurance/Quality Control
RCRA	= Resource Conservation Recovery Act
RCW	= Regulated Controlled Waste
REA	= Registered Environmental Assessor
RFAG	= built-up tar and gravel roofing
RFPTCH	= roof patching compounds
RFROLL	= rolled roofing
RWQCB	= the Regional Water Quality Control Board
SDAPCD	= San Diego Air Pollution Control District
SF	= square feet
STUCCO	= stucco
TEM	= Transmission Electron Microscopy
TSI	= Thermal System Insulation
WLCER	= ceramic wall tiles

PURPOSE AND SCOPE

The purpose of this plan is to describe in detail the steps and actions that the GSA Facility Asbestos Control Manager (FACM), and others involved in operations and maintenance at the facility are required to take to control asbestos containing materials (ACM) at San Ysidro Border Crossing Building CA0588, located at 720 E. San Ysidro Blvd., San Diego, CA.

The specific elements of this plan include:

1. Facility Asbestos Control Management
2. Building Asbestos Assessments
3. Education and Training of Key Persons
4. Medical Surveillance Data
5. Respiratory Protection
6. Special Operations and Maintenance (O&M) Program
7. Periodic Air Monitoring
8. Periodic Surveillance Inspections
9. Record Keeping and work control permit system
10. Communication with Tenants
11. Emergency Procedures – for major and minor fiber release episodes
12. Waste Disposal Procedures and Tracking of Hazardous Waste Manifests
13. Current Federal and State Asbestos Regulations

This FAAP is based upon the building asbestos survey conducted by SCA Environmental, Inc. in June of 2007. It should be noted that the survey was not destructive in nature and was not designed to identify 100% of the asbestos-containing materials (ACM) in the building. Therefore, this plan is to be used for O&M purposes only, and not for the purposes of renovation or demolition activities. GSA requires that a separate, comprehensive destructive asbestos sampling survey prior to any renovation or demolition work.

This FAAP also conforms to the National Institute of Building Sciences (NIBS) Operations and Maintenance (O&M) work practices, second edition.

1.0 Facility Asbestos Control Management

A facility Asbestos Control Manager (FACM) is designated for every GSA-controlled Government-owned/leased building that contains any asbestos-containing materials (ACM). The FACM must be thoroughly familiar with the building, its operation, and asbestos assessment monitoring, control and abatement procedures.

Jose Charles
720 E. San Ysidro Blvd.
San Diego, CA, 92173.
(b)(6)

1.1 Responsibilities

The FACM is responsible for the implementation of all aspects of this FAAP and the management of all asbestos operations and maintenance activities in the building, including:

1. Building Asbestos Assessments & Re-assessments: Manage asbestos assessments and surveys in Building CA0588, located at 720 E. San Ysidro Blvd., in San Diego, CA. Assist the contracted industrial hygienist or other safety and health professionals to thoroughly survey, conduct bulk sampling, and assess the condition of ACM in the facility. Conduct periodic re-inspections and reassessments in locations where ACM has not been removed.
2. Education and Training: Provide or arrange for appropriate asbestos training of key persons.
3. FAAP & Records Management: Manage preparation and updating of action plans and fact sheets (found in the attached appendices) to ensure proper maintenance and permanent retention of asbestos-related records. Assume primary responsibility for preparing and implementing the approved FAAP.
4. Notifications to tenant agencies and visitors: The head of each tenant agency must be notified of the presence of ACM and of the implementation of a site-specific O&M program at the site. During on-going O&M activities, tenants and visitors must be informed of the nature and extent of the work and of their responsibilities with regard to these activities.

A list of responsible persons for this facility, including the FACM, and their respective contact information can be found in Appendix I.

2.0 Building Asbestos Assessments

The inspection and assessment of the building asbestos containing materials should be conducted semi-annually. This section of the FAAP should be updated accordingly, incorporating the information from the latest assessment as part of this plan.

2.1 Identified Asbestos-Containing Materials

The 2007 Inspection Report includes a list of known asbestos-containing materials, locations, quantities and conditions. The 2007 Inspection report and this FAAP reflect the presence of known asbestos-containing materials, locations, quantities and conditions as of June 2006.

Identified Asbestos-Containing Materials:

HA	Material Description
300	Residual un-abated ACM structural fireproofing (1987 bulk sample ID's 130079 - 130083)
315	12" x 12" Gray/green vinyl composite floor tile with lighter streaks and associated mastics
611	Smooth plaster finishing coat over rough, sandy plaster in “CORR 2” of East Head House

The following are suspect materials that were NOT sampled due to the destructive nature of such sampling, or the likelihood that sampling would destroy the function of the material, or the inaccessible nature of the material:

HA	Material Description
AAA01	Assumed mastics under non-suspect gray, textured plastic wall panels
AAA02	9" x 9" Red brick pavers with associated gray grout and mortar
AAA03	Black vinyl composite sheeting with raised circular treads and associated mastics in elevators
AAA04	Black terrazzo with black and white specks
AAA05	Rolled gray gravel roofing and associated mastics on 720, including penthouses and parapets
AAA06	Tar and/or felt vapor barrier assembly
AAA07	Asbestos core fire-rated door
AAA08	Rough, blue and gray speckled terrazzo flooring in HOLD 3
AAA09	6" x 6" Red brick ceramic pavers with associated grout and mortar
AAA10	4' Off-white non-suspect plastic wallboard with associated assumed mastics in the West Headhouse
AAA11	4' White non-suspect plastic wallboard with associated assumed mastics
AAA12	10' White non-suspect plastic paneling with associated assumed
AAA13	Blue terrazzo flooring in Secondary Inspection

1. AAA = Assumed asbestos-containing

2.2 Limitations

With regards to the interpretation of this and future asbestos assessments: this survey upon which this FAAP is based (SCA, 2007) was not destructive in nature and was not designed to identify 100% of the asbestos-containing materials (ACM) in the building.

Any newly discovered suspect materials must be sampled before disturbance. In addition, materials that were found to be trace asbestos containing (<1%), may need to be re-analyzed using point-count methods prior to disturbance for the purposes of OSHA standards and disposal compliance.

This plan is to be used for O&M purposes only, and not for the purposes of renovation or demolition activities. GSA requires that a separate, comprehensive destructive asbestos sampling survey prior to any renovation or demolition work.

2.2.1 Homogenous Area 300 – Original ACM Structural Fireproofing

Homogenous Area 300 is comprised of un-abated original ACM structural fireproofing (1987 GSA c/o Design For Health, Inc. bulk sample ID's 130079 – 130083). Records indicate that the facility underwent extensive asbestos abatement activities in the late 1990's wherein structural fireproofing was abated from most areas with the exception of the main canopy underside of the second floor (see the attached 2002 Cal Inc. Environmental Audit Compliance Report, attachment 9, 1987 Industrial Health Inc. Facility Asbestos Action Plan).

Records indicate that HA 300 was not abated from the main canopy (2002 Cal Inc. Environmental Audit Compliance Report, Attachment 9, 1987 Industrial Health Inc. FAAP). This area was instead enclosed in a rigid barrier of lath and stucco with access hatches for maintenance personnel. SCA visually inspected this area with the assistance of maintenance personnel and a scissor lift. Upon entering the main canopy soffit, SCA noted the presence of ACM structural fireproofing debris settled throughout the space. While SCA was equipped with proper respiratory protection and training, maintenance personnel were unequipped and untrained; as a result SCA was forced to vacate the area after only a brief visual inspection. No additional samples were collected from this inspection area. Photographs of this space are included in Attachment 5.

In addition, SCA conducted confirmatory sampling of accessible structural fireproofing throughout the interior of the facility; all laboratory results were non-detect for asbestos. However, residual ACM fireproofing should be anticipated in inaccessible spaces such as between steel beams and decking, between beams and columns, between structural members and the concrete building envelope, between corrugated steel and concrete decking components, elevator shafts, etc.

3.0 Education and Training of Key Persons

GSA follows ASHARA training requirements and recommendations for all asbestos inspection and work in all regulated public buildings as per EPA and OSHA regulations. The training requirement includes all maintenance and custodial employees, even those who do not disturb asbestos as part of their regular work.

3.1 Class IV - 2 Hour Asbestos Awareness Training

Designated building maintenance and/or custodial employee who may come into contact with ACM (but not disturb) will receive formal 2-hour asbestos awareness training.

This training is sufficient for employees to perform CalOSHA class IV work, defined as maintenance and custodial activities during which employees contact but do not disturb ACM or PACM and activities to clean up dust, waste and debris

3.2 Class III – 16 Hour Hands-on Training

Designated building maintenance and/or custodial employees who may disturb or otherwise handle ACM will receive 16-hour hands on accredited training consistent with EPA ASHARA regulation.

This training is sufficient for employees to perform CalOSHA class III work, defined as repair and maintenance operations, where "ACM", including TSI or surfacing ACM or PACM, is likely to be disturbed.

3.3 Outside Contractors

Whenever asbestos related work is contracted outside the facility maintenance and janitorial staff, it is the responsibility of the FACM to confirm that the contractor has provided its workers with the appropriate level of training. Work practices for asbestos abatement are not included as a part of this FAAP.

3.4 Record Keeping

It is the responsibility of the FACM to ensure that all key personnel involved in any asbestos related work has received asbestos awareness training BEFORE employees are allowed to perform any asbestos related work. Training of key personnel should include, at a minimum, all maintenance and operations staff. It is the responsibility of the FACM to periodically update records of training rosters and certificates in Appendix G of this O&M plan.

4.0 Medical Surveillance Data

GSA employees who perform asbestos related work shall be provided with periodic medical examinations in accordance with OSHA regulation (standard 29 CFR 1910.1001) and with current policies and guidelines of GSA – Region 9. Employees not participating in the medical monitoring program shall not perform work entailing a risk of exposure to asbestos fibers, nor shall they wear respirators.

The medical records pursuant to this section, which are and should remain confidential, shall be placed in the employee personnel file and not be included as part of this FAAP.

It is the responsibility of the FACM to ensure that all key personnel involved in any of the tasks described in section 6.0, and all personnel required to wear respirators, are enrolled in the medical monitoring program. Key personnel should include, at a minimum, all maintenance and operations staff. It is the responsibility of the FACM to periodically update the list of facility employees participating in the medical surveillance program is included in Appendix D

5.0 Respiratory Protection

The respiratory protection program for GSA employees who will be potentially exposed to asbestos shall conform to OSHA requirements (29 CFR 1910.134, 29 CFR 1910.1001, and 29 CFR 1926.1101) The FACM is responsible for implementing a respiratory protection program for the facility that is consistent with the above requirements. The written plan should be updated and inserted in Appendix E.

It is the responsibility of the FACM to ensure that all personnel required to wear a respirator are enrolled in the respiratory protection program. All employees participating in the respiratory protection program must also be included in the medical surveillance program (Appendix D).

6.0 Special Operations and Maintenance (O&M) Program

This section addresses the specific types and conditions of ACM at the facility and the corresponding specific work practices that shall be implemented during work that has the potential to impact these materials. This O&M program must continue until all ACM is removed or replaced with non-asbestos material.

6.1 Responsibilities

The FACM is responsible for the implementation of this program, and the direct supervisors of building maintenance and custodial staff are responsible for implementing precautionary procedures to prevent the disturbance of ACM.

The FACM is responsible for assigning employees to perform the work practices outlined in this section. The FACM is also responsible for assigning an employee, usually a foreman or engineer, to perform regular inspections of the equipment required for performing special O&M work practices and maintaining an adequate supply of disposable materials such as respirator cartridges, disposal bags and coveralls.

6.2 General Work Practices

This section prescribes general O&M work practices useful for all known ACM at the facility.

6.2.1 Wet Wiping, HEPA Vacuuming, and Steam Cleaning

(NIBS Procedure W-9)
These work practices are used either to pre-clean the work area prior to start of work, or for cleaning surfaces as part of a work procedure. The following work procedures are be used for

- Immerse disposable towel in bucket containing amended water.
- Wring out towel and fold into quarters.
- Wipe surface and refold to have a clean face exposed. Do not place towel back into bucket or water will become contaminated and will need to be replaced.
- Repeat step 3 until all faces of towel have been used. Obtain a clean towel if more wiping is needed.
- Dispose of used towels in disposal bags.
- Dispose of contaminated water as required by applicable regulations

HEPA Vacuuming

The procedures to be used for HEPA vacuuming are as follows:

- For floors, use a floor attachment with rubber floor seals and adjustable floor-to-attachment height. For furniture, fabrics or other surfaces use an upholstery attachment or brush attachment.
- Vacuum hard or smooth surfaces with attachment about 1/16" (2 mm) above the surface.
- Vacuum carpet or fabrics with attachment just touching the surface.
- Vacuum all surfaces in parallel passes with each pass overlapping the previous one by one-half the width of the attachment.
- Once surfaces are cleaned in one direction, clean a second time at right angles to the first cleaning.

- Use crevice brush or other tools to clean irregularly shaped surfaces.

Steam Cleaning Carpet

The procedures to be used for steam cleaning carpet are as follows:

- Steam clean carpet using carpet tool.
- Steam clean all surfaces in parallel passes with each pass overlapping the previous one by one-half the width of the attachment.
- Once surfaces are cleaned in one direction, clean a second time at right angles to the first cleaning.
- Water from cleaning process should be treated in accordance with applicable regulations
- (Note: EPA has determined in a research study that HEPA vacuuming and steam cleaning of carpets does not completely remove asbestos contamination.)

6.2.2 Polyethylene Drop Cloth

(NIBS Procedure W-10)
Preparation of work areas for O&M activities typically involves demarcation of the work area, restricting access to the work area and the use of a polyethylene drop cloth.

- Spread a single layer of polyethylene on the floor of the work area and tape or weight in place.
- Do not use more than one layer if ladders (or similar equipment) will be used, unless a hard surface, such as plywood is laid over the drop cloth.
- If floor is a soft material, such as carpet, use caution to prevent tearing of polyethylene under equipment.
- The drop cloth should cover an area large enough to catch falling debris.
- If work is to be performed at an elevated level, the drop cloth should be placed on the work platform, or extended at ground level beyond the immediate work location to catch any debris that might be generated.
- Note that the use of a drop cloth introduces potential slip hazards in the work area. Non-slip foot coverings are recommended where drop cloths are used.
- Drop cloths should be thoroughly cleaned if they are moved from one spot to another or reuse

6.2.3 Mini-Enclosures

(NIBS Procedure W-20)
A mini-enclosure uses fire-retardant polyethylene sheets to seal off the O&M area and can include a separate 3 foot by 3 foot by 7 foot (1 x 1 x 2.1 meters) change room, with curtain doorways, attached to the mini-enclosure for changing and removing protective clothing.

- Erect a framework of wood, PVC piping or metal framing that will enclose the work area and be large enough for one person to work inside.
    - The minimum width and depth of the enclosure should be at least 3 feet (1 meter).
    - The height of the enclosure will vary depending upon the work to be performed and the height of the work area.
- At least 2 layers of polyethylene should be placed over any openable windows and intake equipment vents.
- Construct curtain doorways between the change room and the enclosure and between the change room and the area outside the change room.

- After enclosure is in place, check for, and clean up any debris generated by enclosure installation.
- Mini-enclosures should be set up with a negative pressure system as described below to reduce the possibility of fibers being released from the enclosure and to filter the air inside the enclosure.

Note: *Polyethylene work area protection is not to be used in place of other engineering controls and good work practices. Work practices such as wetting ACM, careful handling, local collection by HEPA vacuum and local exhaust ventilation should be the primary means of fiber control during O&M work.*

6.2.4 Negative Pressure System and Local Exhaust Ventilation

(NIBS Procedure W-20)
Mini-enclosures should be provided with a negative pressure system to reduce the possibility of fibers being released from the enclosure during the work, and to filter inside air discharged from the enclosure. Negative pressure inside mini-enclosures is commonly provided by a High Efficiency Particulate Air (HEPA) filtered vacuum or by negative pressure machines, depending upon the size of the enclosure.

- Locate the HEPA vacuum or negative pressure machine outside the enclosure.
- Duct the intake side of the unit to the enclosure through the vacuum hose or flexible duct material taped to a hole in the enclosure on the side opposite from the change room or as close as possible to where the work will be performed.
- The filtered exhaust side of the unit should be ducted to the outside if possible.
- A HEPA filtered local exhaust ventilation system might replace a negative pressure system if the ventilation system provides adequate negative pressure in the work area.

6.2.5 Applying Lockdown Encapsulant

(NIBS procedure W-12)
A lockdown encapsulant should be applied to areas where ACM is removed.

- Encapsulants should be water resistant after curing and be Class "A" fire rated per ASTM 84-81A "Standard Method for Surface Burning Characteristics of Building Materials, and compatible with any materials that will be installed over the encapsulant.
- Care should be taken to avoid getting encapsulant on or in HVAC units, HEPA vacuums, and negative pressure machines.
- Lockdown is typically applied for O&M work using a garden sprayer.
- Apply in accordance with the manufacturers' recommendations in two light coats sprayed from opposite directions to seal all portions of surfaces including any exposed edges of remaining ACM.

6.2.6 Waste Disposal

(NIBS procedure W-17)
All waste generated from the clean up of spills of ACM or from remediation/abatement activities shall be disposed of in strict accordance with State and Federal regulations. All wastes shall be properly bagged in 6-mil double plastic bags. The bags shall be labeled in accordance with OSHA standard 29 CFR 1926.1101 and 1910.145(d)(4).

Asbestos containing waste material (ACMW) shall be transported by a licensed transporter to a landfill that is authorized to accept ACWM. ACWM shall be classified as non-hazardous if it is non-friable or hazardous if it is friable.

6.3 Specific Work Practices

This section prescribes specific O&M work practices useful for each known ACM at the facility.

6.3.1 Friable Surfacing – HA 300, 611

(NIBS procedure S1

Any work practices that would result in damage to or disturbance of asbestos containing surfacing materials will be performed by a registered Abatement Contractor per the California Business & Professions Code (8 CCR Sections 341.6-9).

For minor procedures associated with the homogenous areas 300 or 611, such as lifting a ceiling tile suspended beneath asbestos fireproofed metal beams (HA 091), the following work practices should be used:

- Demarcate the area of exposure to minimize traffic within the area and to protect persons outside the area from airborne asbestos exposures.
- Use the mini-containment procedures outlined above.
- Use proper protective clothing and respiratory protection as indicated in the building's respiratory protection program
- If work involves shooting or drilling through an asbestos containing material, do so through a wetted sponge or cut the material through a wetted sponge, as applicable.
- Continually wet the controlled renovation area during the process and wet wipe and HEPA vacuum the area.
- HEPA vacuum the area following all work and place the sponge and debris into a sealed plastic disposal bag.
- Double bag and dispose of any resulting debris as hazardous asbestos containing waste.
- Where more than one hundred square feet (>100 SF) of ACM material is disturbed, work must be performed by a registered Abatement Contractor per the California Business & Professions Code (8 CCR Sections 341.6-9).

6.3.3 Vinyl Floor Tile, Vinyl Baseboard, and Mastics – HA 315

(NIBS procedureR1)

The homogenous area 315 consists of asbestos containing vinyl floor tile and associated non-asbestos mastic. Non-asbestos mastic associated with ACM vinyl floor tile is considered contaminated due to the fact that the mastic and the underside of the tile cannot be cleanly separated. Refer to the attached sample location drawings for material boundaries.

The following are specific work practices to be used when working with the above homogenous area:

Removal of resilient asbestos floor tiles

This work practice covers the O&M procedures for removing small amounts of asbestos-containing floor tile mastic (less than 1 waste bag).

- Use the mini-containment procedures outlined above.

- Floor tiles must be wetted (misted with a garden sprayer) before actual removal begins, unless heat will be used to remove tiles.
- Start removal by carefully wedging a wall scraper in the seam of two adjoining tiles and gradually forcing the edge of one of the tiles up and away from the floor. Continue to force the balance of the tile up by working the scraper beneath the tile. Exert both a forward pressure and a twisting action on the blade to promote release of the tile from the adhesive and the floor.
- When the tile is removed place it, without breaking it further into smaller pieces, in a waste bag or waste container.
- If it is necessary to remove more tiles to accomplish the work, after the first tile is removed and accessibility to other tiles is improved, force the wall scraper under the exposed edge of another tile. Continue to exert a prying twisting force to the scraper as it is moved under the tile until the tile releases from the floor. Again, dispose of the tile, by placing in a waste bag or waste container without additional breaking. Continue in this manner until enough tiles are removed to accomplish the work.
- Force the scraper through tightly adhered areas by striking the scraper handle with a hammer using blows of moderate force while maintaining the scraper at a 25 to 30 degree angle to the floor. The resilient floor covering manufacturers work practices recommend the use of safety goggles during this work.
- Continue to wet (mist) the tiles throughout the procedure
- It should be the goal to remove individual tiles as a complete unit, although breakage of tiles is unavoidable.
- If the procedure above is inadequate to loosen tiles use heat to soften adhesive, or alternatively, without first prying up floor tiles using a scraper, thoroughly heat the tile(s) with a hot air gun or radiant heat source until the heat penetrates through the tile and softens the adhesive, and remove tiles by hand or by using a scraper. The resilient floor covering manufacturers work practices recommend that the hot air gun or radiant heat source, tiles and adhesive be carefully handled to avoid burns, and that heated tiles and adhesive be handled only with suitable glove protection for hands. Caution: Over-heating resilient tile might produce harmful vapors, and a respirator with organic vapor cartridges might be needed.
- Wet scrape residual adhesive.
- Deposit tiles in a waste bag or leak-tight container. Do not attempt to break tiles after they are in bag.
- Work where more than one hundred square feet (>100 SF) of ACM or trace asbestos material must be completed by a registered Abatement Contractor per the California Business & Professions Code (8 CCR Sections 341.6-9).

Wet Scrape Residual Adhesive:

- Moisten the adhesive with water mixed with liquid dishwashing detergent (to aid in wetting the adhesive). Wet scrape with a stiff-bladed wall or floor scraper removing ridges and any loose adhesives.
- Place loosened adhesive residues into a waste bag or waste container
- Wet vacuum standing water with HEPA wet/dry vacuum. Use Work Practice M31 if HEPA vacuum needs maintenance, or if bag or filter needs to be replaced.
- Continue the above steps until what remains of the residual asphaltic cutback adhesive is a thin, smooth film.
- Work where more than one hundred square feet (>100 SF) of ACM or trace asbestos material must be completed by a registered Abatement Contractor per the California Business & Professions Code (8 CCR Sections 341.6-9).

Wet Remove residue of adhesive from Concrete with Removal Solution:

- If work that could disturb the adhesive residue, such as drilling through the floor, is going to occur, completely remove residue of adhesive left after removal of resilient floor tile using either the following procedure or the previous wet sand and rubbing stone procedure:
- Put the removal solution onto the residual adhesive with a hand sprayer or rag over the area of removed tile. Put enough removal solution (e.g. mop on, mop off, no machine scrub/stripping solution) to ensure that the area is thoroughly wet. Allow the area to soak for 5-10 minutes. Remove the adhesive by hand scrubbing with a piece of a black floor pad (or equivalent). The sub floor must be kept continuously wet.
- Occasionally push away the adhesive slurry from the sub floor with a wall or floor scraper to check for complete removal. Continue to scrub the floor with the black pad, in the same area until the concrete sub floor is cleaned to the desired degree.
- Wet HEPA vacuum the adhesive slurry. When the HEPA vacuum is full, place commercially suitable water absorbent into the HEPA container until the adhesive slurry is absorbed.
- Rinse area with clear clean water using a hand sprayer or mop. Avoid getting remover on boots. Workers boots should also be rinsed and cleaned if necessary.
- Wet-vacuum standing water with HEPA wet/dry vacuum with a metal floor attachment (no brush).
- Continue with the above steps until adhesive is completely removed in the required area.
- Allow sub floor to dry and vacuum using a vacuum equipped with a HEPA filter and metal floor attachment (no brush).
- Wet-wipe and/or wash down all equipment used during the work.
- Work where more than one hundred square feet (>100 SF) of ACM or trace asbestos material must be completed by a registered Abatement Contractor per the California Business & Professions Code (8 CCR Sections 341.6-9).

6.3.4 Other Miscellaneous Non-Friable Asbestos Containing Materials – HA AAA1, AAA2, AAA4, AAA6, AAA7, AAA8, AAA9, AAA10, AAA11, AAA12, AAA13

(NIBS procedure section M)
The homogenous areas AAA1, AAA2, AAA4, AAA6, AAA7, AAA8, AAA9, AAA10, AAA11, AAA12, and AAA13 consist of assumed ACM non-friable miscellaneous materials. Refer to the attached sample location drawings for material boundaries.

The following specific work practices should be used when performing operations and maintenance activities with the potential to impact any of the homogenous areas above:

- Demarcate the area of exposure to minimize traffic within the area and to protect persons outside the area from airborne asbestos exposures.
- Use the mini-containment procedures outlined above.
- If work involves shooting or drilling through an asbestos containing material, do so through a wetted sponge or cut the material through a wetted sponge, as applicable.
- Continually wet the controlled renovation area during the process and wet wipe and HEPA vacuum the area.
- HEPA vacuum the area following all work and place the sponge and debris into a sealed plastic disposal bag.
- Double bag and dispose of debris as non-hazardous waste so long as it has not become friable during removal.

- Where more than one hundred square feet (>100 SF) of ACM material is disturbed, work must be performed by a registered Abatement Contractor per the California Business & Professions Code (8 CCR Sections 341.6-9).

6.3.5 Roofing Materials – HA AAA5

(NIBS procedure M13)
For minor O&M tasks such as shooting, cutting or drilling through roofing felts and tars, the following work practices should be observed.

- Install polyethylene barriers at roof vents, skylights and openings within 10 ft. radius of the work
- Shoot or drill anchors through a wetted sponge, where feasible, following installation of polyethylene drop cloths on the floor or other surfaces.
- Continually wet the controlled renovation area during the process and wet wipe and HEPA vacuum the area.
- HEPA vacuum the area following all work and place the sponge and debris into a sealed plastic disposal bag.
- Double bag all wastes and dispose as Category 1 non-friable waste.
- Work where more than one hundred square feet (>100 SF) of ACM or trace asbestos material must be completed by a registered Abatement Contractor per the California Business & Professions Code (8 CCR Sections 341.6-9).

7.0 Periodic Air Monitoring Results

Periodic personal air monitoring to confirm exposure levels is required for all personnel who may be exposed to asbestos in order to ascertain proper procedures and protection. In addition, periodic air monitoring shall be conducted whenever asbestos containing materials are abated by a registered Abatement Contractor per the California Business & Professions Code (8 CCR Sections 341.6-9). This includes monitoring of air quality outside of any asbestos work zone as well as clearance air testing inside a work zone following abatement procedures. Results from air monitoring shall be updated in this FAAP by the FACM and shall be included in Appendix C as records of contracted abatement work.

8.0 Periodic Surveillance Inspections

In accordance with GSA policy, the FACM is responsible for overall FAAP program administration and direct supervisors of facility maintenance and custodial staff is responsible for the cleaning and maintenance work and precautionary measures required to prevent the disturbance of ACM at the facility.

The FACM, or other trained GSA employee, shall conduct semiannual surveillance inspections of the building ACM, at a minimum to ensure that the material remains undamaged. The FACM shall use the attached inspection form (Appendix A) and include completed inspection forms in the updated appendices of this FAAP.

9.0 Record Keeping

The following records must be assembled and maintained by the FACM as part of the FAAP:

a. Survey/assessment reports
b. Floor plans with material and sample location information included
c. Laboratory reports indicating the presence or absence of asbestos in suspect materials
d. Assessment of materials identified to contain asbestos
e. Re-inspection and re-assessment results
f. Records of renovation and demolition activities conducted involving ACM
g. Records or documents of contracted abatement work
h. Records of medical surveillance results and a record of all employees participating in the medical surveillance program
i. Records of all employees participating in the respiratory protection program
j. Fit-testing records
k. Asbestos waste disposal manifest records and landfill receipts

10.0 Communication with Tenants

In accordance with OSHA regulations 29 CFR 1910.1001 and 29 CFR 1926.1101, the FACM is responsible for communicating potential hazards to employees and tenants.

Warning labels shall be attached adjacent to any friable or non-friable ACM located in routine maintenance areas. All warning labels shall be permanently displayed in readily visible locations and shall remain posted until the ACM has been removed.

The heads of the tenant agencies shall be notified of the presence of ACM in the facility and of the implementation of a special O&M program in the building. In addition, each tenant with the authority to make alterations to their space must be notified of the extent of asbestos present and the applicable requirements as per this FAAP.

The FACM will send out a statement to all affected parties within two weeks prior to the start of any abatement or alteration project that will involve asbestos. This pre-abatement statement shall contain the current location and quantity of ACM and or PACM present in the area, a description of the work to be performed, and the precautions taken to prevent exposure of building occupants to airborne asbestos fibers.

Following the completion of any abatement or alteration project that will involve asbestos, the FACM shall submit a post-abatement statement to all affected parties, including employers and employees adjacent to the work performed. This post-abatement statement shall inform tenants of the location and quantity of any residual ACM/PACM, as well as the results of any final monitoring.

Lastly, the FACM shall re-notify tenant agencies if the findings of the survey report accompanying this FAAP are significantly different from asbestos information previously furnished.

11.0 Emergency Procedures

This section is intended to provide specific work practices in the event of fiber release episodes such as during severe and unexpected water damage, earthquake or other event that causes ACM to be disturbed and results in an unforeseen fiber release event.

11.1 Minor Fiber Release Episodes

The FACM shall be notified immediately if visibly deteriorated ACM is encountered. The area will be isolated until the debris from these materials can be cleaned up properly. Any dust or debris from these materials shall be cleaned up by the following methods:

- The debris shall be isolated and the FACM notified. If the debris must be isolated for an extended length of time, greater than 1 hour, the debris shall be lightly misted with water and/or covered with plastic sheeting so as not to disturb the material.
- The debris shall only be cleaned up by properly trained personnel utilizing appropriate methods and personal protective equipment. If properly trained personnel are not available or the debris is greater than three (3) square feet of material, an asbestos abatement contractor shall be contracted to clean up the damaged material.
- The debris shall be cleaned up using wet methods-and/or vacuumed using a vacuum equipped with a high efficiency particulate air (HEPA) filtration system.
- The debris shall be promptly cleaned up and disposed of in leak tight container in accordance with Federal, State, and local regulations. All containers shall be properly labeled.

If the spill or release is more than three (3) square feet an asbestos abatement contractor shall be used.

11.2 Major Fiber Release Episodes

In the event of a catastrophic even such as an earthquake, damage assessments must be performed that are outside the scope of this FAAP. First the structural integrity must be assessed. After the building has been determined to be safe to enter, qualified personnel using respiratory protection and other appropriate PPE must assess the condition of the ACM present. This inspection will assess the amount of damaged ACM present and the amount of cleaning, repair and abatement required before the building can be reoccupied.

12.0 Waste Disposal and Tracking of Hazardous Waste Manifests

All waste material containing asbestos must be properly containerized, labeled, stored and disposed of in accordance with Federal, State and local regulations at approved disposal facilities. The FACM shall retain copies of Hazardous Waste Manifests for every disposal, copies of which must be maintained as a part of the FAAP in Appendix H.

Applicable regulations for the disposal of asbestos containing waste include:

a. OSHA standard 29 1926.1101
b. Department of Transportation (DOT) 49 CFR Parts 171 and 172 regulating the transport of hazardous materials on public thoroughfares.
c. EPA regulations (40 CFR) National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Section 61, subpart M.

12.1 Specific Disposal Requirements

All waste generated from the clean up of spills of ACCM or from remediation/abatement activities shall be disposed of in strict accordance with State and Federal regulations. All wastes shall be properly bagged in 6-mil double plastic bags. The bags shall be labeled in accordance with Title 8 CCR Sections 5208 and 1529 and Title 22 CCR Sections 66262.31 and 66262.32.

Asbestos containing waste material (ACMW) shall be transported by a licensed transporter to a landfill that is authorized to accept ACWM. ACWM shall be classified as non-hazardous if it is non-friable or hazardous if it is friable.

Appendix A
Assessment Results

SEMI-ANNUAL ACM REINSPECTION ASSESSMENT FORM

To be conducted by a trained GSA employee ONLY.

Identified Asbestos-Containing Materials:

HA	Material ID	Material Description	Condition Reassessment
ASBESTOS CONTAINING MATERIALS			**Friable? (Y/N); Damaged? (Y/N); Comments**
300	STSFP-300	Residual un-abated ACM structural fireproofing (1987 bulk sample ID's 130079 - 130083)	
315	FLVCT-315	12" x 12" Grey/green vinyl composite floor tile with lighter streaks and associated mastics	
611	WLPL-611	Smooth plaster finishing coat over rough, sandy plaster in Corr 2 of East Headhouse	

Suspect materials that have not been sampled:

HA	Material ID	Material Description	Condition Reassessment
ASSUMED ASBESTOS - NOT SAMPLED			**Friable? (Y/N); Damaged? (Y/N); Comments**
AAA01	PANEL-AAA1	Assumed mastics under non-suspect gray, textured plastic wall panels	
AAA02	BRICK-AAA2	9" x 9" Red brick pavers with associated gray grout and mortar	
AAA03	FLVCT-AAA3	Black vinyl composite sheeting with raised circular treads and associated mastics in elevators	
AAA04	TERRAZZO-AAA4	Black terrazzo with black and white specks	
AAA05	RFROLL-AAA5	Rolled gray gravel roofing and associated mastics on 720, including penthouses and parapets	
AAA06	VAPOR-AAA	Tar and/or felt vapor barrier assembly	
AAA07	FIREDOORS-AAA	Asbestos core fire-rated door	
AAA08	TERRAZZO-AAA8	Rough, blue and gray speckled terrazzo flooring in HOLD 3	
AAA09	PANEL-AAA10	6" x 6" Red brick ceramic pavers with associated grout and mortar	
AAA10	PANEL-AAA11	4' Off-white non-suspect plastic wallboard with associated assumed mastics in the West Headhouse	
AAA11	PANEL-AAA12	4' White non-suspect plastic wallboard with associated assumed mastics	
AAA12	TERRAZZO-AAA13	10' White non-suspect plastic paneling with associated assumed	
AAA13	PANEL-AAA10	Blue terrazzo flooring in Secondary Inspection	

Corrective actions recommended/taken: _____

_____

_____

_____

_____

_____

_____

Inspector's Name: _____ Inspector Signature:_____ Date of Inspection:_____

FACM Initials: _____ Date FACM Received: _____

Appendix B
Renovation and Demolition Activities Records

RENOVATION and DEMOLITION ACTIVITY RECORD

Date	Activity Description	Contractor	Materials Affected	Comments

FACM Initials: _____

Appendix C
Records of Contracted Abatement Work

CONTRACTED ABATEMENT RECORD

Date	Activity Description	Contractor	CA Registered?	Materials Affected	Abatement Method	Disposal Record Reference #

FACM Initials: _____

Appendix D
Medical Surveillance Records

MEIDCAL SURVEILANCE RECORD

Employee Name	Job Description	Asbestos Medical?	Respirator Medical?	Date of Medical	Comments / Medical Restrictions

FACM Initials: _____

Appendix E
Respiratory Protection Program Records

RESPIRATORY PROTECTION PROGRAM RECORD

Employee Name	Job Description	Respirator Medical Date	Fit-Test Date

FACM Initials: _____

Appendix F
Fit-Testing Records

RESPIRATOR FIT-TESTING RECORD

Employee Name	Job Description	Respirator Medical Date	Fit-Test Date	Respirator Brand & Type

FACM Initials: _____

Appendix G
Training Records

ASBESTOS AWARENESS TRAINING RECORD (2-hr CalOSHA Class IV / 16-hr CalOSHA Class III)

Employee Name	Job Description	Type of Training (CalOSHA IV or III)	Date of Training	Training Administrator

FACM Initials: _____

Appendix H
Asbestos Waste Disposal Records and Landfill Receipts

Appendix I
FACM Contact Information

GSA ASBESTOS OPERATIONS & MAINTENANCE CONTACT INFORMATION FOR SAN YSIDRO BORDER CROSSING BUILDING CA0588 801 E. SAN YSIDRO SAN DIEGO, CA 92115

NAME	TITLE	PHONE	ADDRESS
Jose Charles	Facility Asbestos Control Manager; Building Manager	(b)(6)	801 E. San Ysidro Blvd. San Diego, CA, 92173.
Aaron Sifluentes	Building Engineer	(b)(6)	801 E. San Ysidro Blvd. San Diego, CA, 92173.